

#1351

RECEIVED

JAN 16 2004

BLM PRINEVILLE
DISTRICT

John Stephenson
17401 Cascade Estates Dr
Bend, OR 97701

January 14, 2004

Bureau of Land Management
Prineville District Office
3050 NE Third Street
Prineville, OR 97754

Re: Comments on the Draft Upper Deschutes Resource Management Plan

First, let me say it is clearly evident that a tremendous amount of effort went into the development of this plan and EIS. You are to be commended! As a wildlife biologist who used to work for the Forest Service, I have written many plans and environmental documents. I know these large-scale programmatic plans are especially difficult to develop, since they must address so many different activities, resources, and issues. It's a huge job to synthesize, analyze, and present so much information, and to develop management alternatives that both take care of the land and meet the expectations of people who want to use it. You have done an admirable job. I particularly applaud your GIS folks – the maps in this plan are very well done!

What I want to bring to your attention is an apparent error in the preferred alternative's land tenure zone designation (as shown in Map 34) on the west side of the Cline Buttes Management Area. Map 34 shows that almost all of the Cline Buttes Management Area is proposed for Zone 1 designation. However, for some unexplained reason, two distinct areas are identified for Zone 2 designation: (1) BLM lands west of Fryrear Road, and (2) BLM lands along the southern edge of the Management Area in Township 16S, Range 11E north of Hwy 20 (see attached map).

I could find no justification for why these areas were separated out in this way and it conflicts with other aspects of the preferred alternative. I'm wondering if it is an inadvertent error and request that you revisit the land tenure zone map to make sure these areas receive the correct designation.

The following characteristics of these areas, as described in the preferred alternative (Alt 7), are what lead me to believe they warrant a Land Tenure Zone 1 designation:

- Peck's Milkvetch ACEC -- Map 7 shows that, under the preferred alternative, both of these areas are within the proposed boundaries of the Peck's Milkvetch ACEC expansion area. It does not seem appropriate to consider trading out of lands that are within ACECs and I noticed that all existing ACEC areas are designated as Zone 1.
- Priority Old Growth Juniper Restoration area -- Map 6 identifies the area west of Fryrear Road as a "Priority Old Growth Juniper Restoration" area. I noticed that all other areas receiving this designation are also in Land Tenure Zone 1.
- Secondary Wildlife Management Emphasis Area -- Map 29 shows wildlife management emphasis designations for the preferred alternative. The western third of the Cline Buttes Management Area, including the area west of Fryrear Road, is designated as a "Secondary"

wildlife management emphasis area, while most of this Management Area received a "Minor" wildlife emphasis designation. It seems like areas receiving this elevated emphasis designation should be retained and I noticed that most other areas in the "Secondary" category are in Land Tenure Zone 1.

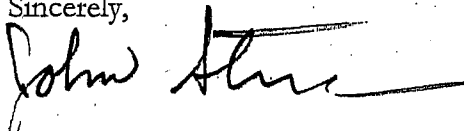
- "General Areas Desirable for Acquisition" -- Map 34 identifies the gap between the Tumalo Management Area and the southern edge of the Cline Buttes Management Area as a "General Area Desirable for Acquisition." I assume the reason for this designation is the clear importance of this area as a habitat connection and corridor for wildlife movement, not only between BLM management areas, but also as a linkage to the Deschutes National Forest. Habitat connections such as these -- between forest and high-desert habitats -- are extremely important and increasingly rare given ongoing development patterns.

Of equal significance, the entire Northwest Management Area is identified as a "General Area Desirable for Acquisition", presumably for its importance as a key habitat linkage between National Forest lands to the west and north and BLM lands to the south and east. This Management Area is also designated as a "Primary" Wildlife Management Emphasis Area in the preferred alternative. Yet, it too is given a Land Tenure-Zone 2 designation. I hope you will reconsider this designation. An area that is of primary importance to wildlife and a key habitat connection should remain in BLM ownership.

I realize that a Zone 2 designation does not mean that BLM has specific plans to trade out of these areas. However, the manner in which these areas have been 'carved out' from the adjacent large block of Zone 1 lands has the clear effect of highlighting them as lower priority areas. Hopefully, you will agree that the information I have presented, from your own preferred alternative, indicates they do not deserve this lower priority status.

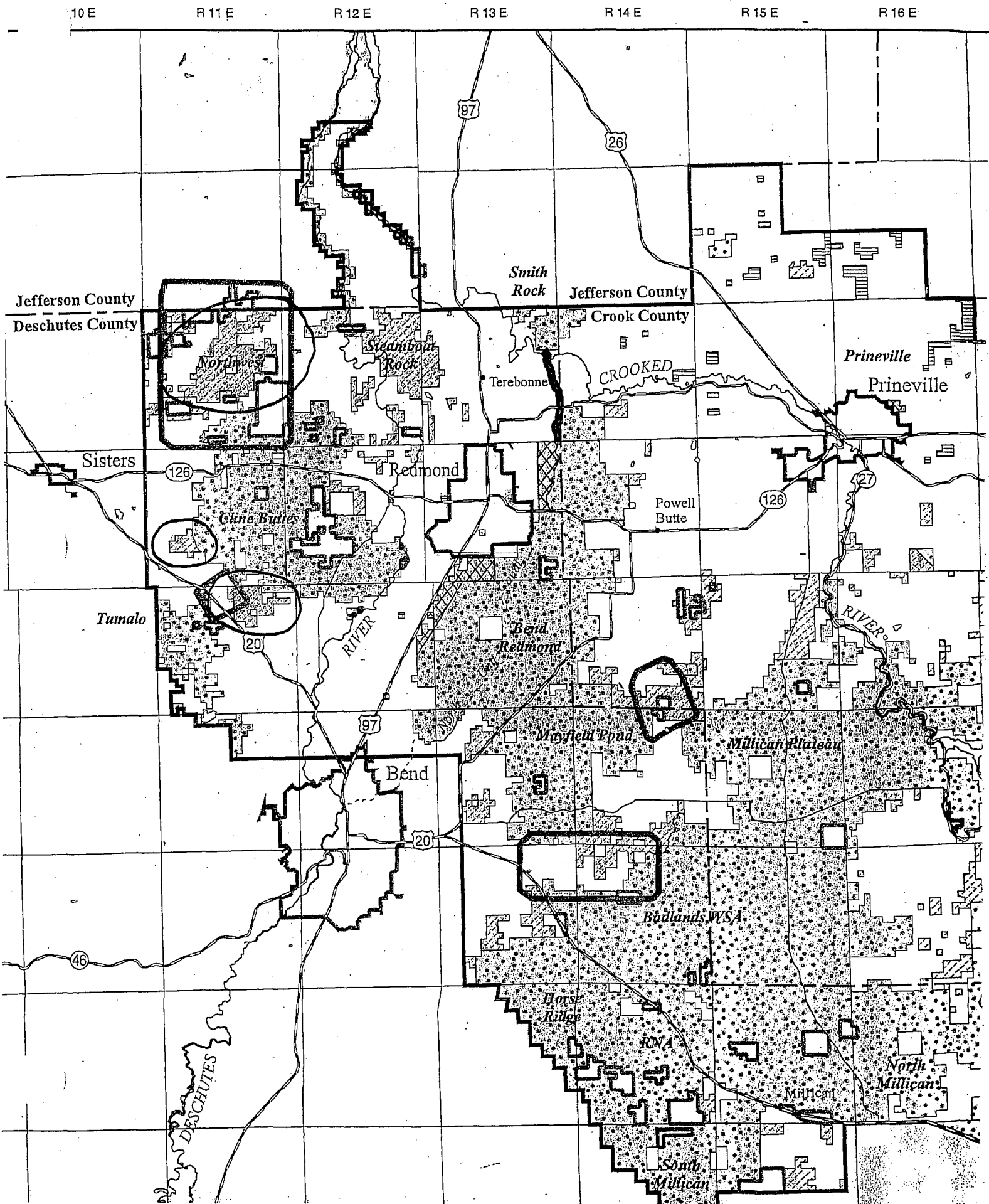
Thank you for giving these comments your consideration. —

Sincerely,



John Stephenson

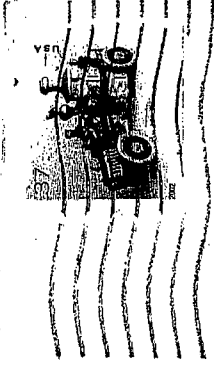
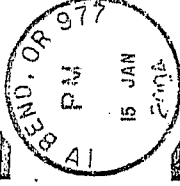
Map 34: Land Tenure Zones



John Stephenson
17401 Cascade Estates Dr
Bend OR 97701-9240



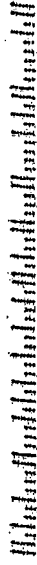
#1351



Bureau of Land Management
3050 NE Third St.
Prineville, OR 97754

ATTN: Teal Purrington

97754#2900





CITY OF REDMOND

#1352

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JAN 16 2004

BLM PRINEVILLE
DISTRICT

January 14, 2004

Teal Purrington
Bureau of Land Management
3050 NE 3rd St
Prineville, Oregon 97754

Dear Ms. Purrington,

As a follow up to our meeting with Janet Hutchison, Robert Towne and Phil Paterno on September 30, 2003, I am submitting this letter of interest in regard to the 318 acres of land located on 19th Street just south of the County Fair Grounds in Redmond. As discussed this land belongs to BLM and is set aside for community expansion.

The City of Redmond is interested in the property for community expansion to be used for utility purposes. We are currently undergoing an engineering study and updating our Facility Plan for Redmond's Wastewater Utility. Although Redmond's engineering study is not yet complete, it is estimated that Redmond would need an estimated 25 acres for wastewater facilities with possibilities of additional land needed for irrigation purposes.

If you have any questions I may be contacted at: 541 504-5071 or 541 480-2977.

Sincerely,

Kevin S. Curtis
City of Redmond
Wastewater Division Supervisor

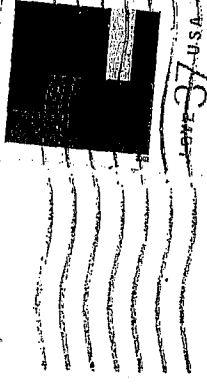
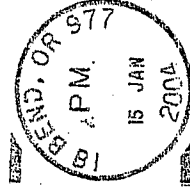
cc: Mary Meloy, PW Director
Jo Anne Sutherland, City Manager
Janet Hutchison, BLM

CITY OF REDMOND



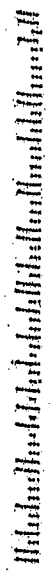
716 SW Evergreen
PO Box 726
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#1352



Teal Purrington
Bureau of Land Management
3050 NE 3rd St
Prineville, Oregon 97754

5773482900 #002



Comment Form

For public input on the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement

RECEIVED

Today's Date: 12 Jan 2004

JAN 16 2004

Your name (please print): Rob Robbins

Representing (put an X in one box only):

BLM PRINEVILLE
DISTRICT

☒ self only, or

☐ business, organization, or agency (list): _____

Street Address, State, and ZIP: 19345 DUSTY Loop 97701

Phone: 541-388-7333

E-mail: _____

Important Privacy Notice: All written comments, including names and street addresses, will be available for public review upon request, and may be published by the BLM during the planning process. However, as an individual you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☒.

Comments:

- 1) Roads, Roads, Roads... wide roads, narrow roads, long roads, jutting roads, Roads all over the land; there are too many Roads in the plan! I see a conflict between the number of open roads and the BLM's ability to meet and maintain habitat effectiveness.
- 2) Roads, Roads, Roads... the plan needs to reduce road density to increase wildlife patch size. The idea of closing roads in one area but allowing roads to be created in another area may impact wildlife patch sizes by creating adverse wildlife conditions. This includes trail ^{pieces}.
- 3) The plan managers must continue to contract out to Lisa and Janet. It's an economic impact to supporting local community members. It's a good thing.
- 4) OHV trails, existing & future, in Sage grouse habitat must be managed to benefit the Sage grouse recovery. Human Recreation will continue to grow and only thru BLM ^{open use} regulations will habitat be saved for the birds. More birds is a good thing!
- 5) Areas should be set aside as "Separated Use" ^{yes} for nude sunbathing. Winter Seasonal closure is acceptable.

Continue your comments on additional pages

Comments....We'd appreciate yours

Public comments are an important part of our land management planning efforts. By giving us your feedback on the draft, we have the opportunity to consider your concerns before we create the final plan. Your input helps us identify those things we may have overlooked or not looked at closely enough. We will consider your comments through a public comment analysis process. This analysis identifies the comments that may trigger us to make factual corrections, modify or add alternatives, or supplement the analysis before a final plan is written. Our ultimate intent is to create a well balanced and effective plan; one that will guide important decision making on BLM administered public lands in Central Oregon for years to come.

In addition to your own ideas, please take a moment to think about the following questions and consider them when writing down your comments.

- ❖ Does the range of alternatives adequately address the issues? How would you modify the alternatives to better address those issues? Please be descriptive and specific in your response (See Executive Summary for short version of the range of alternatives or refer to the Draft UDRMP for the full description of alternatives).
- ❖ Does the Preferred Alternative represent a reasonable balance of land uses? Please be specific in your response.
- ❖ Does the Preferred Alternative create the vision we want for future management of BLM administered public lands in Central Oregon? If not, what do you think should or should not be part of the vision? Is the emphasis in the right areas?
- ❖ Are there relevant environmental, social or economic effects of the proposed plan that we have not fully considered? If so, what are they and why do you think they should be considered in this decision?

Turn in your written comments at any of the public meetings, or mail or e-mail them to us by January 15, 2004.

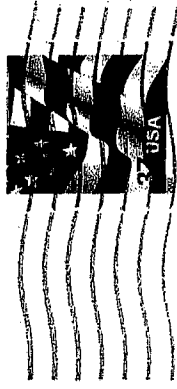
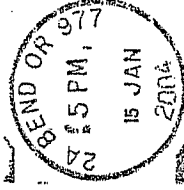
Thank you for your interest in public lands in Central Oregon!

- 1) Oregon Spotted Frog - a federal candidate species for listing under the Endangered Species Act. No provisions have been made in the plan to work towards saving this species or to keep it from becoming proposed. I encourage all realty transactions to acquire riparian habitat in the Lapine area or to hold onto riparian habitat real estate.
- 2) I question the BLM's capabilities to implement the plan's details such as road & trail closures.
- 3) Please detail BLM's plan to provide LEO staffing.
- 4) Bend-Redmond corridor allocation: as Hwy 97 grows to Expressway status, this corridor will house a frontage road to the east. Topography does not act as a barrier to BLM managed lands. I question BLM's ability to protect those lands east of Hwy 97 from off-road vehicle and illegal activities.
- 5) Finally, the Plan needs to make everyone happy, & contribute to world peace!

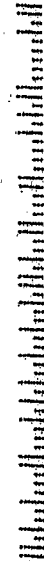
19345 Dusty Q
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#1353

Prineville BLM
c/o Draft WORMP
3050 NE 3rd St
Prineville, OR 97754



97754#2300



#1354

RECEIVED

January 12, 2004

JAN 16 2004

BLM PRINEVILLE
DISTRICT

UDRMP Project,
Attn: Teal Purrington
Bureau of Land Management
Prineville District Office
3050 NE 3rd Street
Prineville, Oregon 97754

Dear Ms. Purrington,

The Willamette Valley Grotto, in association with the National Speleological Society, has carefully studied the Upper Deschutes Resource Management Plan and Environmental Impact Statement. We support the decision by the BLM to select Alternative 7 as the preferred option. In addition, we would like to make the following comments regarding the 1,000-page document.

- Through out the document the BLM refers to Stout Cave as Pictograph Cave and only four times as Stout Cave. It was our understanding from previous communications with the Prineville BLM that you were trying to re-establish the historical name as Stout Cave.
- On page 100, Table 2-15, Priority ranking of at-risk significant archaeological resources, the contents that make up the "Significance of Heritage Property" are missing from the document. There is no explanation of the meanings of items A, B, C or D. We cannot determine what the rankings are for Redmond and Stout caves.
- The Grotto finds it unimaginable the BLM would consider sport rock climbing in Stout Cave in Alternatives 2, 3 and 4. On page 543, Archaeological Consequences, the document says, "Currently, all caves within the planning area have not been inventoried to determine their resource values." How can the BLM risk damage to undiscovered archaeological history by promoting a usage clearly adverse to the resource? With the USFS policy on Road 18 to ban sport climbing, an opposing BLM policy would certainly undermine the Forest Service position.
- On page 81, Management Direction Common to Alternatives 2-7, the document says, "The use and/or possession of chalk or visually apparent hand-drying agents would also be prohibited in Significant/Nominated Caves," but later on page 199, this same sentence appears in the description of Alternative 7. The statement appearing only in Alternative 7 implies the BLM would allow chalk under the other alternatives. We feel this is a mistake. In fact, from a cave point of view, Alternatives 5, 6 and 7 are

the same.

We applaud the BLM for considering caves in the RMP for the first time and the acceptance of the responsibility outlined in the Federal Cave Resources Protection Act. The decision to fence and ban motor vehicles from the 40-acre Redmond Caves parcel will go a long way toward protecting the caves on the land. The graffiti and trash problems have reached a crisis level and considerable effort will be required to restore the caves to their original condition. Caves restored and remaining in their natural condition is our and the BLM Vision for caves.

A handwritten signature in cursive script, appearing to read "Tom Kline".

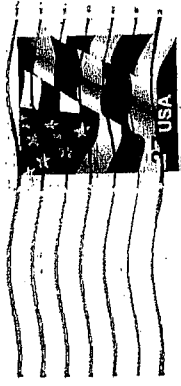
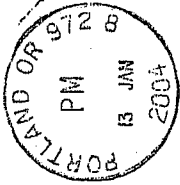
Tom Kline,
2004 Chairman, Willamette Valley Grotto

personal address:

Tom Kline
5172 SE Logus Rd.
Milwaukie, OR 97222-4267

Illamette Valley Grotto
o Tom Kline
72 SE Logus Road
ilwaukie, OR 97222-4267

#1354



UDRMP Project
Attn: Teal Purrington
Prineville BLM
3050 NE 3rd Street
Prineville, OR 97754

9775442300

RECEIVED

#1355

January 10, 2004

JAN 16 2004

Bureau of Land Management,
Prineville District Office
3050 NE Third St
Prineville, Oregon 97753

BLM PRINEVILLE
DISTRICT

Upper Deschutes RMP Team,

As a concerned citizen that recreates in Oregon I would like to be on record as supportive of motorized recreation on BLM lands in Oregon, especially Central Oregon.

The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

I do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? This is especially critical for the Lapine and Prineville area residents.

Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually – **the increasing use is not only not reflected in the severe limitations proposed for OHV use on BLM land, it appears to be prejudicially discriminated against.**

Please adopt a more flexible road trail density criteria to allow for the best use of the land, and for a designated trail system that will succeed. Micromanaging your areas and attempting to designate different trails for several different uses in the same areas management will fail, and ultimately our use will suffer further restrictions.

BLM Upper Deschutes Resource Management Draft – Specific area issues, and objections;

In regard to Cline Buttes:

Pecks Milkvetch ACEC expansion – not what general consensus was during issue team discussions. **Increase of 6,000 acres impacts historical OHV use to an unacceptable level.**

Separate systems for motorized and non-motorized is not realistic and a prescription for failure. It will polarize the users, decrease every ones area of usage, does not support a multiple-use philosophy, micromanages the area, and will increase conflicts among users. You should be questioning the goals your agency followed that led you to propose a "solution" such as this.

The management direction in Alt. 7 is unrealistic and beyond the scope of BLM administrative resources.

The Tumalo canals are thought to be some of the best riding areas in the area and too important to the users to close.

The Plan will not accommodate current use in Cline Buttes, and does not address increased use/demand for the life of the plan. This is not logical, and it is not good scientific problem solving.

The Interim Plan is not defined enough for comment.

In regard to Lapine:

Closure of historically open designation in all of BLM land bordering Lapine, except Rosland Play area, is not possible to implement with current resources nor necessary for wildlife concerns. Wildlife does not need ALL of the planning area. Area residents will be dramatically impacted without due cause.

Snowmobiling needs to be exempt from the limitations completely.

In regard to South Milican:

Issue team discussion of the area proposed an increase in the seasonal use that is not noted in Alt 7. August thru April would be a necessary addition to recreational opportunities considering all the recreational opportunities Alt 7 takes from motorized recreation and it would not negatively impact wildlife concerns.

In regard to Badlands:


This area is not critical habitat or deer winter range and ODF & W did not have issue with usage in the Badlands. If wildlife concerns are minimal, it is not good management to close it to OHV use due to social issues unrelated to the use, i.e., fence cutting, garbage dumping, partying and illegal hunting. The issue is inadequate on-the-ground management by your agency. Own it, and fix it.

In regard to Prineville Reservoir:

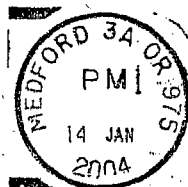
Managing current OHV use by closure without any recreational opportunities is unwarranted.

There are many opportunities for improvement in this for us all. I look forward to discussing the upcoming OHV actions in the final management plan with you.

Sincerely,

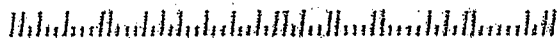

Valerie J. Kershner
3031 Adams Circle
Medford, Or 97504
541-608-1044

1
ms Circle
OR 97504
(5)



Bureau of Land Management
Prineville District Office
3050 NE Third St.
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977534+2500



#1356

January 14, 2004

RECEIVED

JAN 16 2004

BLM PRINEVILLE
DISTRICT

Bureau of Land Management
3050 N.E. 3rd Street
Prineville, OR 97754

To Whom It May Concern:

I have read and reviewed the BLM Upper Deschutes Resource Management Plan and have attended meetings to discuss the plan.

Of critical importance to me is the part of the plan that deals with the BLM Wierleske allotment referred to in the plan as the Tumalo Block – 700 acre parcel south of Tumalo Reservoir Road. This is a minuscule piece in the overall Upper Deschutes Management Plan, but it is a critical piece to Rock Springs Guest Ranch since it provides the only access corridor to our other permitted riding areas on the Deschutes National Forest and Crown Pacific timberland.

Rock Springs Guest Ranch has been the steward of this parcel of land for over 35 years, dating back to 1968 when Donna Gill purchased land adjacent to this BLM allotment and built a guest ranch. Grazing permits on this allotment were transferred when she bought property in 1968, and at later dates we further formalized our connection through acquiring a special recreation use permit and through the adopt a space program. Our private land borders this property for 1.25 miles.

Inspection of this property will reveal that it is in excellent condition, especially considering its proximity to Bend. Very little off-road vehicle use, garbage dumping, or use conflicts have occurred.

I've tried to reference my comments to specific topics and areas of the plan, however, the information is repeated in many places throughout the plan and is often commingled. Below are my comments relative to the plan and the Wierleske allotment.

I. Special Recreation Permits & Designated trails(vol. 2, pages 200,207,208, 477,479)

A) All alternatives of the plan, except number 1, indicate that:

“Special Recreation Permits for trail dependent annual use would only be issued for designated trails that are part of the BLM’s transportation system.” (vol. 2, page 200)

“This would change the overall management emphasis of BLM lands in the planning area in a fundamental way, removing the emphasis on exploration, user choice, and self-creation of recreation opportunities.”(vol. 2, page 477)

As stated in the plan, designated trails are a new concept for BLM recreation that is a significant change in direction from prior dispersed use. Accordingly, the Wierleske allotment has no designated trails at this time. The BLM has requested that we GPS these trails which we are in the process of doing.

B) Common to Alternatives 2-7, Special Recreation Permits/group uses page 479

“Over the short term, all annual special recreation permits for trail use would not be renewed until such use was authorized on designated trails that are part of BLM’s transportation system. Over the short term, this would eliminate the two annual SRP’s for equestrian use in the planning area. However, this would also provide an impetus for trail designation in areas that currently do not have any identifiable trail systems.”

Rock Springs Guest Ranch has had Special Recreation permits from the BLM since 1991 and has operated a horseback riding program on the Wierleske allotment since 1969. Prior to 1991 the BLM didn’t deem it was necessary to have an SRP for this small piece. The prior owners of the guest ranch property, the Vansickle family, had also run a riding stable at this location for many years.

Our business has been built around a riding program that is dependent on the adjacent BLM parcel for trail rides and to access our other permit riding areas on Deschutes

National Forest(DNF) and Crown Pacific properties. We have spent 35 years creating a reputation and building a client base for our week-long summer family program that brings people from all over the world to enjoy a horseback riding centered vacation in central Oregon.

The implementation and approval of a designated trail system could be years away. To eliminate our permits, even over the short term, will block our access to our other permitted riding areas. A cancellation or non-renewal of our permit until the "designated trails" are implemented would devastate our business. If Special Recreation Permits under these plans are only to be issued for use on designated trails, then the existing permittees(Rock Springs Guest Ranch and Equine Management) should be given a reasonable time frame for this system to be put in place.

The plan needs to be modified to allow for our continued use of the Wierleske allotment until such time that we can work with the BLM to develop and authorize these designated trails and add them to the BLM's transportation system.

C) "Over the long-term, as more designated trails (both motorized and non-motorized) are developed, it is likely that this policy would direct annual recreation permits to larger areas with substantial trail systems. Smaller commercial operations and commercial operators that are tied to a specific location(e.g., small guest ranches) would have a harder time gaining permits if they are located adjacent to BLM lands that do not have designated trails and lack the ability to shuttle clients to larger BLM areas with designated trails." (vol. 2, page 479)

Part of the beauty of a destination vacation is being able to recreate from the base property. The horseback riding experience we provide cannot be duplicated by trucking people to another location. The adjacent Wierleske allotment is contiguous to thousands of acres of DNF land that connects all the way to the Three Sisters area wilderness boundary(BLM maps of DNF in packet do not show current land configurations since the

Crown Pacific & DNF land swap). The BLM together with the DNF land is not a small isolated block of public land. We have special use permits for horseback riding on about 2500 acres of this DNF land. In addition, we also have riding permits on about 4500 acres of Crown Pacific timberland that is adjacent to the BLM and the DNF.

D) "Large, group rides are relatively commonplace on BLM administered lands, although no designated or maintained trails exist on BLM administered lands for equestrians, and no staging areas have been developed for their use." (vol. 2, page 307)

Rock Springs Guest Ranch maintains miles of trails on the Wierleske allotment.

II. Organized Group Uses (vol. 2, pages 200, 479)

"SRP's would be required for all organized group activities involving greater than 20 participants." (vol. 2, page 200)

During our peak season in the summer, group sponsored outings to this small area would definitely create user conflicts with our operation.

III. Recreation and tourism (vol 2 , page 554)

A) "However, while tourism and recreation have this important regional role, the BLM lands within the planning area do not serve as primary tourist destinations."

In fact, Rock Springs Guest Ranch attracts visitors from all over the world to central Oregon because of its summer family vacation programming. The core of this program is daily horseback riding that takes place on BLM land.

The economic value of what we do is significant. What we call the Summer American Plan(SAP) is an all inclusive week long vacation package. It includes accommodations, all meals, recreational programming including horseback riding and childcare / youth

activities. We employ 50 staff during this time to take care of 50 guests a mix of adults and kids. Twelve to fifteen fulltime staff as well as ten additional part time staff are employed year round.

Less than 8 percent of our clients during this summer program come from Oregon and Washington so a high percentage of our clients use air transportation to get to central Oregon. Most of our clients also partake of other paid recreation activities in the area like golf, white water rafting and Wanderlust tours(canoeing, caving, nature hikes, etc..).

We are considered one of the best guest ranches in the nation. People looking for this type of high end family vacation look at a wide variety of vacation options. Geographic location is not necessarily important. They choose us primarily based upon what we offer in terms of programming.

The guest ranch experience makes available to persons all over the United States and the world access to properties held in trust by the United States government for the benefit of the citizens. Most of these people do not have the knowledge, equipment or time to pursue these activities on their own.

We are open year round and outside of the summer program we operate as a conference facility.

VI. Trail Densities & Access points(vol. 2, pages 207 & 208)

A) "Designated trails would be developed to serve as links to the Deschutes National Forest lands to the west, as well as to provide several smaller loops within BLM lands. The road and trail density goal for the main block would be limited to a range of approximately 1.5 to 2.5 miles per square mile(including Sizemore Road, a paved public road through the area.)" – (vol. 2, page 208)

Although the Wierleske allotment is not part of the Tumalo "main block" the trail density seems very low.

Using the BLM maps I have for the Wierleske allotment I calculate the size as 800 acres, not 700 acres. For example, does this mean that 800 acres divided by 640 acres(a square mile) = 1.25 square miles? Using the maximum trail density of 2.5 times 1.25 = 3.13 miles of trail. If densities this low were used on the Wierleske allotment a single trail running north to south through this parcel would use up 2 miles one way. This trail density would make it difficult to achieve the objectives of "several smaller loops" and connections to the "DNF".

Rock Springs Guest Ranch has a special use permit on the DNF(adjacent and to the west of the Wierleske allotment) covering 2500 acres. Trail densities for this area have been approved at a much higher level, at about 6.5 miles of trail per square mile.

The Wierleske allotment is not your typical central Oregon BLM land. The Wierleske allotment is heavily treed primarily with juniper and a fair amount of ponderosa pine. Visibility is probably less than 50 yards in many areas of this allotment. This may lend itself to higher trail density, since you cannot see people on another trail that may not be that far away. Also, this is not a square piece of land, but a rather long piece north to south. The other lands we have permits on, DNF and Crown Pacific, each have frontage of 1 mile of common boundary on the BLM. Most of the travel through this BLM parcel is east / west with some connecting loops north and south. To alleviate bottle necks we have multiple connections from the BLM onto DNF and Crown Pacific our east / west access corridor. The DNF accesses that connect to the BLM are DNF permitted designated trails.

A 1.5 to 2.5 miles of trail density would probably also cause conflicts among non motorized users(walkers, joggers, mountain bikers and equestrians) since they all would be confined to so few trails within this region. The quality of peoples experience is diminished when you see, or run into, other people. This low trail density would also not

allow for any rotation and variety of use of trails. For us, when people are here for a week's vacation with the possibility of up to 14 rides during that week, multiple trails are important to provide variety, rotation of trails, and reduce the bottlenecks.

The Guest Ranch has 1.25 miles of frontage on the Wierleske allotment and currently has at least 7 access points along this frontage. Multiple rides depart the ranch at roughly the same time each morning and afternoon during the summer months. To avoid bottlenecks, we disperse the rides to various routes. This not only provides for a better experience, but it is a safety issue. The heavy dust and bunching of horses creates an unsafe environment. During our summer season, even though we accommodate up to 50 guests per week, horseback rides are always lead by a guide and are conducted in small groups of usually not more than 7 riders. The guest ranch riding activity is much lower during the spring and fall and almost non-existent during the winter. This fits well with the winter deer range management.

Many people live in Tumalo because of the public recreation options close by. The idea of riding your horse from your barn to miles of open space is very appealing and often why they bought their property out here. Our neighbors also ride, bike, walk and jog through our property to gain access to the public lands to the west of the guest ranch along our 1.25 mile border with the BLM. Our 660 acre property border has more than a dozen contiguous neighbors and they have neighbors around them that ride through them and us. This is another reason that we need multiple BLM/Rock Springs Guest Ranch access points.

The plan should consider greater trail densities and non-motorized access connections to other adjacent lands.

Map attached showing adjacent DNF, Crown pacific boundary and Rock Springs Guest Ranch boundary.

B) "Roads would be retained or developed in the Tumalo block only to the extent necessary to create or access parking areas, trailheads or developed sites, or to serve existing administrative use." (vol. 2, page 208)

Would Rock Springs Guest Ranch have vehicular access to fulfill our obligations for grazing permits, fence repair and maintenance, and emergency evacuation in case of an accident?

In several sections, Sizemore road is described in the plan as a paved public road, it is not paved and it is a rough gravel road that gets limited use.

V. Stewardship (vol. 2, page 471)

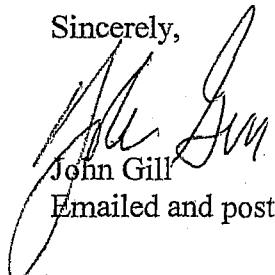
A) "Diversity of recreation opportunities is dependent upon the BLM and its partners to provide facilities, services and active resource and social management." (vol. 2, page 471)

Throughout the plan there are many references to "BLM partners" and volunteers. Rock Springs Guest Ranch has taken care of this piece of land for decades. Garbage removal, reporting of fires and unusual or illegal activities, fence maintenance, trail closures, etc.. It is our intention to continue our relationship with the BLM and help them accomplish their goals for the Wierleske allotment. In past years we have offered our help to the BLM to GPS and formalize the trail system and establish a "trailhead", parking area, and restrict motorized access to this land. Much of this could not be accomplished until the "plan" was in place.

We will continue to monitor activity on this land for resource damage, use conflicts, illegal use, dumping, etc.

Thank you for your time!

Sincerely,



John Gill

Emailed and postal

* * *
 179
 3600 # 00.830 JAN 15 04
 345A
 UNITED STATES POSTAGE
 P89767953
 MAILED FROM ZIP CODE 97701



ROCK SPRINGS
 GUEST
 RANCH

#1356

64201 Tyler Road • Bend, Oregon 97701 • (541) 382-1957

Pineville RM
 c/o Dealt UD CMP
 3050 NE Third St.
 Pineville, OR 97754

RECEIVED

JAN 15 2004

BLM PRINEVILLE
DISTRICT

Danny Clark
8407NW 31st St.
Terrebonne, Ore. 97760

Deschutes Resource Management Plan

I would like to respond to the Upper Deschutes Resource Management Plan.

The first issue I would like to address is STEAMBOAT ROCK AREA. I have lived in this area for 29 years. I have seen a lot of changes over that time. The most impact I think I have seen; is the claiming of private property; putting up fences and posting the property to keep people out; which they have every right to do. It has blown me away at times to see what I thought was public and what was private. Times sure changed, both with standards of conduct and population growth. I understand BLM's stance of wanting to close this area off to just smaller off road vehicles and shut down target practicing. It is nice that BLM considered Hunting Season as the only reason to discharge a firearm in this area, but more needs to be considered. I live next to BLM land. While sometimes the target practicing is annoying, it is not. A big problem as far as bullets passing by, the deer don't seem to change their habits when this happens. They arrive at my hay at the same time and spend the night.

I think a better awareness campaign, of such things like use of a backstop when shooting, take your target when you leave, and don't be careless while shooting; this is serious business and would help. I think it is nice to leave an area open for hunting season was nice, but if we leave the coyotes unchecked, there is going to be a bigger problem with them. You should hear the different packs, howling back and forth to each other now. We have lost several sheep to coyotes and it is getting worse each year.

As far as garbage dumping, it is always going to happen no matter what you do. People are cheap or lazy. If you would do a road closure it wouldn't be as deep as some dumping in the interior, but it will happen. We have people dumping their garbage at the end of our driveway every once in a while. I think enforcing the law would work better. For example, in the late 70's I was walking out on BLM land and I came upon several pickup loads of empty paint cans, and old files from a Body Shop. I believe it was Redmond Auto Body and Repair. I called the Sheriff's Department and nothing happened. The cans remained to rust away; this was in the days when you didn't have to pay to take the stuff to the dump, if I remember right.

I enjoy being able to ride my horses, walking, and just getting in my pickup and drive around, or just park in the middle of somewhere to enjoy the peace and quiet, and relieve a lot of stress.

Secondly is the POWELL BUTTE AREA. While I haven't been up to the Powell Butte area in quite a while I noticed on Page 13 Vol. 3, it says continued designation for Powell Buttes, as RNA/ACECs It states no collection of any rock materials for Rock Hounds. For one, I wasn't aware that rock hounding was illegal up in the region or maybe

this is going to be a new rule. There is some very unusual Agate that was created in this region, e.g. some purple lace agate and clear agate with 3D dimensional shapes inside. As far as Animal Control, such as Coyotes and Cougars, You're going to have some problems; domestic animals are easier to hunt, eat, and kill. In my opinion Powell Buttes are semi safe from over use, it is almost impossible to find any access. This place is nothing like it used to be. Doesn't FLPMA mandate BLM to manage lands and not cut off lands for multiple uses.

I am a frequent user of BLM as well as a volunteer to check Guzzlers around The Glass butte and Hampton area. I wouldn't want you to think that I am just a user; one of the activities I enjoy is Rock hounding. It is appearing as if you want to confine Rock hounds to 4 areas, I can understand how these areas would be great for tourists, but are no means places I would want to be restricted to. . It appears BLM wants to close off some existing roads to create larger parcels of Habitat. To one degree I can agree. To another the facts don't bare out your conclusions as I have experienced them. Wildlife is no different than anything else in the world. They seek out the easiest way to live, with the least amount of people contact. I'm sure you'll have to agree it's undeveloped, native, natural lands such as BLM and the Forest Service ground that borders farm ground, especially hay fields that support the highest percentages of wildlife; birds and rabbits excluded. One of the things that bother me about closing off roads, is access for all. The way I see it is environmentalists and the few young people that like to get away from it all, would like to close everything off, as much as they can. Here is the problem, as a person gets older, he cannot walk places he used to drive to; to enjoy. Why punish the people who would probably do the least amount of damage.

I have had some older folks as friends. We would go out cutting wood, hunting, or prospecting. We would try to go to special places they used to go, only to find the road had been blocked off. Some places are just neat to go to see or just have a picnic. Here's one example, Rupert Davis wanted to show me a special spring that ran year around. He and his family would drive to this place with lots of empty containers; they would picnic and fill all the containers before their return trip home. Granted this was only done when roads conditions and weather were favorable. It was a special treat. When he tried to show me the spot, the road was blocked off and it would have been a 2-mile walk or so, just to get to the spring. Rupert was in his late 70's and couldn't make the round trip if he wanted to. He was sure disappointed. Over the years a few places I could drive to are block off by BLM/USFS, but I can still walk. Think of the favorite places that you can drive to. We have all sorts of modification for the handicapped in the city, but they can be shut out in the country. There will always be people who break the law and are inconsiderate of others around them, they should be cited and fined. It's not right to punish everyone. A lot of people are moving into Central Oregon and don't like certain things or ways things are being done. Maybe they should move back to where they came from, since the place they came from is so great. I live next door to BLM ground and a lot seems to go on at times. To top that off, I live next to a Cinder Pit that is mined from time to time. I chose to live here and that is how things are, so a little noise and a little dust are no big deal. That's life in the country, just a side comment; I work haying equipment in the middle of the night. Deschutes County has a rule, you move to farming

country and you better expect these things to happen. Deschutes County will not cite a farmer doing his work no matter the noise level. If he is putting up a crop. I don't think we need more regulations, just enforcement of laws and regulations on the books. If we were all considerate of the other person, the next person to come along would have a great experience also. For the jerks out and about maybe we need a hot line to turn them in. Then Law Enforcement needs to fry them. I understand closing certain areas for a period of time to accommodate wintering wildlife and reduce the wear and tear on weather sensitive roads. I am all for giving a safe haven, when they are so very stressed due to cold weather, lacks water and food. I can wait the 5 months of so, but the rest of my life, YUCK!! I am not suggesting new roads either except to accommodate logging and mining. Is there another way to keep the Bad Lands roadless and vehicle free without making it a Wilderness?

I think of things, what if a fire runs through there, it will be just a lot of charred remains. Don't we have enough examples already? Look at Mill Creek Wilderness area. The area was once managed forest; along time ago, with roads running through it. Then it became a Wilderness Area to be used by a few people. Now it is a charred, wasted trees, that was salvageable. Now we're going to have a lot of windfalls, lying on top of each other, making travel on foot difficult. The downfalls then become another fire hazard as grass, and brush grows up around the dead wood and another fire could break out. I can understand some Wilderness Areas like Eagle Cap or Mt. Whitney, or wherever. Some don't make sense, such as, Mill Creek and soon to be, it sounds like, the Badlands.

—I hope this set of opinions matter to some degree. I know you all have put in a lot of time and energy to have special alternatives. Thank you for giving public time and materials to read to at least put in a comment or two. I hope this isn't as an ex-employee put it; BLM only wants comments, so they can form a response to the public for the plan that they have already formulated, and that is just the way it is going to be.

Thank you for you time,

Danny Clark

DAVID - CLARK
PO BOX 510
TERREBORE, OK
97760

#1357

TEAL PURRINGTON

UPPER DESCUTES RESOURCE MANAGEMENT PLAN

#1358

Bureau of Land Management
Prineville District Office
3050 NE 3rd Street
Prineville, Oregon 97754

RECEIVED

JAN 20 2004

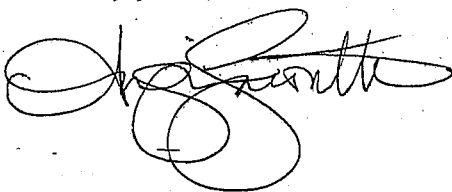
BLM PRINEVILLE
DISTRICT

Att: Mollie Chaudet

As an avid four wheeler in Central Oregon I can not find any reference in your Upper Deschutes Resource Management Plan and Environmental Impact Statement which mention my form of recreation. I enjoy Rock Crawling in my four wheel-drive vehicle as do many of my friends. I would like to offer my knowledge and skills in developing an area that would remain open for years to come for Rock Climbing. In the past I have work with your agency to developed one but to date no area has been designate for this growing recreation. All of the other Rock Climbing Trails are on public lands in this nation. There are many areas which would be ideal for this recreation with in your planning area.

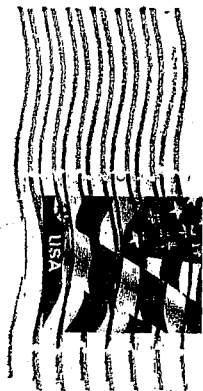
I am a avid Four-Wheeler and support Alterntative-2 as it leaves more Public-Lands open to all recreational users including my family and I. Pubic-Lands are for all of us to use and closing it down for any one group is wrong. Each year there are more of us wanting to recreate on public lands. Would it not be wise as land mangers to use all trails for multiple uses? In the past years we have shared our trails and it has been fine.

Sincerely yours;



Wright
DO-2005718
Bond or 977288

Att: Mollie Chaudet



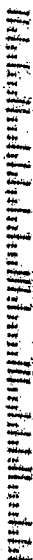
#1358

Insurance and Management
Furniture Dist Office

3050 ME 3rd St

Phoenix OR 97754

57754#1317



#1359

Jeal Purrington
Bureau of Land Management
3050 W.E. Third St.
Prineville, Or 97754

RECEIVED

JAN 20 2004

BLM PRINEVILLE
DISTRICT

1.9.2004

63475 Cathy Ct
Bend Oregon
97701

Dear Mr Purrington:

We are residents of Cammaron City. We enjoy riding out in BLM - (Mayfield BLM Parcel) we also take walks -

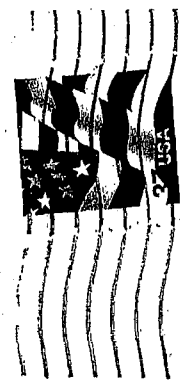
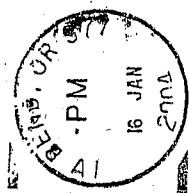
We are concerned with the amount of shooting & off road vehicles that are becoming a real problem. The land is becoming more & more uprooted with donuts of off road vehicles destroying plant life and soil. Shooting out here is a real problem - trees are being destroyed. I would hope that somehow a designated shooting area could be set up. It's not safe to ride or walk out there on the week-ends. The wild life suffers also. I'm hoping in your Alternative 7 that you could keep in mind some of the problems I have mentioned. Thank You for your hard work and also reading my letter!

Sharon Mastruck
63475 Cathy Ct
Bend Or 97701

Recently we have spotted a bald Eagle, were hoping
just maybe this will result in more in this area.



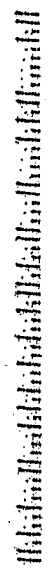
Mr. Lowell O. Mastrud
63475 Cathy Ct
Bend, OR 97701



#1359

Jeal Purrington
Bureau of Land Management
3050 N.E. 3rd Street
Prineville Oregon 97734

97754#2900



#1360



"Brent Fenty"
<bfenty@earthlink.net>

01/20/2004 10:28 AM

Please respond to
"Brent Fenty"
<bfenty@earthlink.net>

To <upper_deschutes_RMP@or.blm.gov>

cc

bcc

Subject Upper Deschutes RMP Comments

To Whom It May Concern:

I am writing in regards to the DRAFT Upper Deschutes Resource Management Plan (RMP)...I commend the Prineville District BLM for the significant amount of work that has been invested in the completion of this draft plan. For the most part, I think the plan successfully balances the needs and interests of a variety of stakeholders. My primary concerns involve two issues: wildlife and non-motorized recreation.

As a public participant in the planning process, I several times voiced concern that deference was too often given to motorized recreation at the expense of non-motorized recreation and wildlife. Although I commend the BLM for finally closing the Badlands WSA to motorized recreation in order to ensure the preservation of wilderness values in the WSA as required by federal law and BLM policy, I am deeply concerned that Alternative 7 will allow continued motorized access in the 5,000-acre area north and east of Dry River Canyon. This area was left out of BLM's original wilderness inventory but has been demonstrated to meet wilderness criteria for size, solitude and recreation opportunities, and it's substantially natural condition. In addition, the area contains a variety of supplemental values including cultural sites and important habitat for a variety of wildlife species including raptors, sage grouse, Rocky Mountain elk and mule deer. Furthermore, when combined with the Badlands WSA, the area represents a significant amount of roadless acreage which is becoming increasingly rare in Central Oregon.

Secondly, I encourage the BLM to continue its creative and constructive efforts with local government and the interested public to develop a livestock grazing management matrix which allows for voluntary grazing permit retirement and takes into account the interrelationships of recreation, changing land use practices, and livestock grazing on and around Central Oregon's public lands. The expeditious review of standards and guides for each of the allotments will be critical to the success of this effort and I encourage the BLM to develop a realistic and fully-funded approach to completing the process in the near future.

Lastly, I am very concerned that motorized recreation continues to take precedence over the management of our public lands for sensitive wildlife such as pronghorn and sage grouse in the Millican Valley. In some ways, I believe this plan represents a step backwards from the management practices on the Millican Plateau over the past decade. Sage grouse are known to be declining across the West and it is imperative that we take immediate steps to ensure survival of and successful recruitment by the remaining populations within Oregon.

Thanks for the opportunity to comment.

Sincerely,
Brent Fenty
PO Box 142771
Anchorage, AK 99514
bfenty@earthlink.net

RECEIVED

JAN 20 2004

BLM PRINEVILLE
DISTRICT

#1361

To: Prineville Bureau of Land Management
3050 N.E. 3rd Street
Prineville, Oregon 97754

Subject: Upper Deschutes Resource Management Plan and Environment Impact Statement.

Purpose: Comments on Plan and Purpose

I studied three manuals on the Upper Deschutes Resource Management along with eighty small and two large maps.

I support alternative #2, for the following reasons:

1. You are not now protecting the subject put forward by the study.
2. ORV vehicles
3. Range management
4. Wildfire protect by habitat
5. Resident herd of elk next to W.S.A.
6. Historical sites
7. Rock hunting areas
8. Wood cutting
9. Fire
10. Camping
11. Moving area of road
12. Vehicles to other areas (Cline Butte and West of Redmond)

You need to put your energy into protecting what you have, not add more projects until you do.

I think you need more time to discuss these decisions and inform the public and the people who will be affected by these decisions.

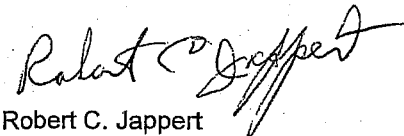
There are many more areas of concern such as why are you trying to acquire Reynolds Pond? Also what about the resident herd of elk adjacent to the W.S.A.? Without all of the questions answered I support alternative #2 until you have time to address all issues not just the emotional ones. Making decisions based on scientific data and not emotions should be implemented. You have the resources and personal to accomplish this. On staff includes:

Soil Scientist, Range conservation, Archaeologist, Fish and Wildlife Biologist, Horticulturist, Historian, Fire Control and Foresters.

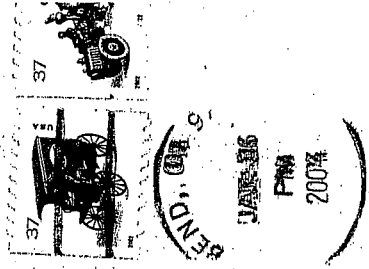
Allow these people to do their jobs and help with the decisions at hand.

Thank – you for all of the time and effort put into this project, but lets step back and answer all of the questions before making a final decision.

Robert C. Jappert



ROBERT C. WATKINS
3240 S. YERW
Redmond, Oregon
97756



PRINEVILLE BUREAU OF LAND
Management

3050 NE 3rd STREET

PRINEVILLE, OREGON

97754

#1361



Crook County

#1362
dup
1307

300 N.E. 3rd Street • Prineville, Oregon 97754

Phone (541) 447-6555 • FAX (541) 416-3891

RECEIVED

JAN 20 2004

BLM PRINEVILLE
DISTRICT

January 15, 2004

U.S. Bureau of Land Management
Prineville District Office
ATTN: Teal Purrington
3050 NE Third St.
Prineville, OR 97754

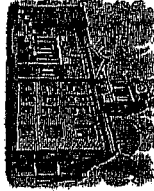
Dear Ms. Purrington,

The Crook County Natural Resources Planning Committee—a broadly representative group of agency personnel, business, community, agricultural interests, timber and environment/conservation interests appointed by and serving at the pleasure of the Crook County Court—has prepared the attached comments regarding the BLM Upper Deschutes Basin Resource Management Plan. By consensus, the group has adopted these comments. It is my pleasure to forward these additional comments to you to supplement the comments previously filed by Crook County.

Sincerely,

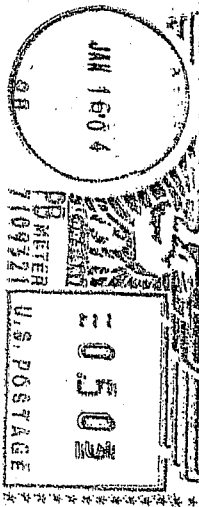
Scott R. Cooper
Crook County Judge

Cc: Crook County Commissioners
Ms. Lynn Anglund, Crook County Natural Resources Planning Committee
Mr. Mike Lunn, Crook County Natural Resources Planning Committee
Baron Bail, Robert Towne, Molly Chaudet, Prineville District BLM



Crook County
300 N.E. 3rd Street
Prineville, Oregon 97754

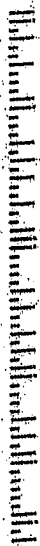
PRESORTED
FIRST CLASS



#1362

Bureau of Land Management
Teal Purington
3050 NE Third Street
PO Box 550
Prineville, OR 97754

LAENISHS 97754



CROOK COUNTY, OREGON NATURAL RESOURCES PLANNING COMMITTEE

Comments on Draft Environmental Impact Statement Upper Deschutes Resource Management Plan

January 15, 2004

Background - The Crook County Natural Resources Planning Committee (CCNRPC) was established by County Order 2002-72 on September 4, 2002. Its 25 members represent a diverse cross-section of the citizens of Crook County. Membership includes foresters, silviculturists, wildlife and fisheries biologists, agriculture scientists, range conservationists, large and small business people, farmers and ranchers, environmentalists and citizens-at-large. A key purpose is the cooperation and collaboration with federal agencies in order to further considerations of important issues of Crook County Customs, Culture and Economy. Our comments are provided in that spirit.

Public Participation - We commend the BLM for the extensive efforts they have made to involve citizens through its various Issue Teams, RAC's, etc. This has clearly been beyond the normal approach, and beyond the minimal requirements of law and regulation. In some respects, the public involvement early on was found by participants to be cumbersome and complicated, at least through the development of Issues. One suggestion we would offer is to work closely with Dr. Laura Van Riper, of the National Riparian Service Team, on a system of follow-up interviews from those who closely participated and others. It will be important to document "lessons learned" and ways to continue the strong efforts at involving the public while also reducing some of the more burdensome and time consuming parts of the process. This information should be shared with the Ochoco NF, which is soon to begin its own LMP Amendment processes.

Range - Given the importance of livestock operations in Crook County, we have specific concerns with some of the proposals. This month, proposed regulations were released for administration of grazing permits, and while they will not be final for several months, the UDRMP FEIS is even further out into the future. Our assumption is that development of those regulations will be closely followed during the continuing work on the FEIS to insure the FEIS and regulations are compatible.

The matrix in the DEIS that includes the range health analysis, grazing demand, and conflict with other use information seems to have been a good analysis tool for this planning effort, but should not automatically be considered adequate where different conditions of resources and grazing activities occur. In UDRMP area, there are many small allotments that might lend themselves to voluntary closure. In areas dominated by larger allotments, such as contiguous resource areas, voluntary closures would be the exception. We also note that closures may be affected by the changing regulations.

We question whether mandatory or voluntary closures are in keeping with the proposed regulations, and the 10th Circuit Court of Appeals decision in *Public Lands Council v. Babbitt*, 929 F.Supp. The mandatory closures due to conflicts with other uses should be carefully considered, and all attempts made to provide for the forage needs of the dependent operators. It seems clear under current direction that suitable grazing land should be offered according to priority to qualified applicants. Uses such as "reserve forage allotments" will not be permitted under the revised regulations. For some areas, such as near La Pine, there is little or no demand for grazing areas due to lack of water and marginal economic conditions associated with grazing. While we understand some environmental groups seek to buy permits to retire them, this is specifically prohibited under the proposed regulations in keeping with *Public Lands Council v. Babbitt*, op cit.

OHV – We believe that recreational use of OHV is a growing and legitimate use of many, but certainly not all areas of our public lands. In general, we support the direction contained in alternative 7, which attempted to work out resource conflicts with OHV uses by separating uses and designating motorized trail systems and specific areas where OHV recreation can occur. At the same time, we find that OHV use potentially can be one of the most destructive uses of public lands if it is not carefully controlled and managed. Unfortunately, many of the commercial advertisements for OHV's are irresponsible, depicting SUV's, 4-wheelers and other vehicles traversing streams, wetlands, mountain terrain and other sensitive environments simply as a challenging activity, and ignoring the potential effects on plants and animals. This carries over to many in the user community.

We recognize that many riders/drivers are responsible, and avoid sensitive areas and follow the rules. We also know that many of the organized groups and associations promote responsible behavior, and work with the agencies to provide enjoyable outdoor experience and protect the environment. And we also believe that OHV use is an activity that has grown rapidly in the past few years, and is largely uncontrolled across the public lands and National Forests in central Oregon. Given the dual potential for a) providing some outstanding recreational activities and b) damaging lands and disrupting populations of plants and animals, a most important focus of this plan needs to be on clear management direction and well-implemented and enforceable management tools.

We have little reason to believe the BLM has the financial or staffing ability to implement the major changes envisioned by Alternative 7. It calls for reducing or eliminating use in some areas and constructing extensive networks of new and loop trails in other areas. On its face, this sounds good, but what assurances exist that the trail and area closures can be enforced or regulated? The DEIS contains no clear monitoring plan describing how it will be determined how well natural resource and OHV objectives are being met, or what happens if they are not achieved. Without the reduction in use that is called for in some areas, the problems will simply be expanded by opening or improving other areas, which has been the history of the Millican OHV area. We recommend that a Cooperative Agreement, with funding by BLM, be developed with the Crook County Sheriff to fund additional patrols, including OHV patrols in key areas to increase enforcement. This is particularly needed to reduce violations of State law, such as

littering, vehicle operation and registration, and wildlife harassment (this has been reported to ODFW/OSP/BLM).

Further, we would urge that the closures and other regulation changes be implemented and monitored before extensive investment in new development. Citizen/user groups should be involved in monitoring to bring transparency to the decision-making process.

Last, we noted that the definition of "non-motorized recreation emphasis" on page 33 is poorly worded and not understandable.

Social and Economic – The DEIS is deficient in identifying the costs and benefits of the various alternatives as they apply to Crook County. While there is some information about the different socio/economic conditions applicable to Deschutes County and Crook County, there seems to be little explanation about how those Counties are affected by the separate alternatives. Crook County has shown recent growth along with our neighbors, but our values remain largely rural and agrarian. Protection of open spaces, local businesses, and family are important, and separate us from our rapidly growing neighbors. We will never have the kinds of recreation developments as those year-round large scale opportunities near Bend, such as ski areas and other winter sports developments, mountaineering, etc. Prineville Reservoir is our major destination recreation area, and we have supported certain continued development in that area. But by and large, the citizens of Crook County and other users tend towards more undeveloped uses including fishing, hunting, and firewood gathering, hiking, driving for pleasure and OHV use.

Unemployment in Crook County is among the highest in the State, and it would be helpful to show how the various alternatives contribute to the creation of jobs, particularly in the contracting area.

Management of Invasive Junipers – We support the juniper control work proposed in Alternative 7, but prefer to see management of old-growth juniper on the basis of stands and not individual trees. For example, in treating invasive juniper to restore suitable habitat for sage grouse, we recommend removal of all trees in the treated area to reduce perch trees for predatory birds. Leaving trees of "old-growth form" in those areas reduces the effectiveness of the restored habitat.

There are many areas where treatment of juniper for restoration, firewood harvest, or any other purpose will be economically and/or physically impractical. Those are largely the isolated patches or rim rock type habitats where older juniper frequently occurs, and management for old stands is logical in those areas. Given the extensive acreages of invasive juniper in Crook County, priority areas chosen for restoration should be treated to minimize juniper stems of all sizes and age classes.

Millican Road – While this road decision was removed from the EIS process by legislative direction, the BLM needs to be aware and plan for the changes in use that will develop once the reconstruction and paving is completed. Granted, there will be

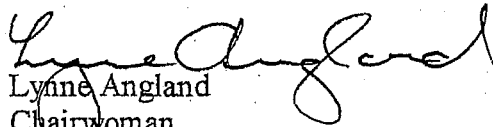
extensive truck traffic on the route, but increasing numbers of recreationists of all kind will likely use the more easily accessible area for hunting, rock-hounding, hiking, biking, OHV, etc. This could increase conflicts with wintering game populations and special species such as sage grouse. Impacts and changing management conditions from this improved transportation facility does not seem adequately considered in the DEIS.

Firearm Use – We support the EIS direction to reduce indiscriminate shooting in areas close to population development. Another step that might be taken would be the creation of a local rifle/shotgun range close to Prineville through special use permit or concessionaire. The Redmond Gun Club is relatively close and available, but having a local range might reduce some of the dispersed plinking, and increase safety of public lands users.

Garbage Dumping – Dumping of garbage is a perennial problem on public lands, and part of our concern about inadequate levels of funding and staffing for enforcement. Several considerations should be made to reduce this abuse. Cooperative funding for the Crook County Sheriff to increase patrol density would help, since garbage dumping is a violation of both federal and state laws. The County has indicated a willingness to set up a “free dump” day at the County landfill in conjunction with organized clean-up efforts for the public lands. There is opportunity to use inmates from the local youth correctional facility for clean-up under agreement with the BLM to extend the clean-up efforts. Educational efforts to make people aware of the extent of dumping should be undertaken. Partnerships with local companies should be undertaken to remove larger metal dumps, such as refrigerators, old cars, etc. Once cleaned, efforts should be made to restrict access to the more heavily abused areas. In some cases such as the Crooked River corridor, volunteer groups could pick up and consolidate trash to be removed by helicopters during fire crew training. We recommend increased emphasis and direction for protecting our public lands from this obnoxious type of violation.

Transportation System Planning – The planning area is heavily roaded by all levels of routes, ranging from collector systems to user created “ways.” This extensive road system reduces the effectiveness of wildlife management attempts, and we encourage the BLM to consider seasonal and area closures and other techniques to reduce the conflicts with wildlife. Achieving the desired habitat effectiveness of 70% on many key areas will be difficult or impossible without further access restrictions.

Thank you for the opportunity to comment on the Upper Deschutes Resource Management Plan DEIS. Our committee remains very interested in the outcomes of this plan and potential effects on customs, culture and economy of our County. We hope to be further involved as the work proceeds toward a final EIS and decision, and would offer to help convene and/or work directly with other affected interests in considering responses to substantive comments and resolving issues.


Lynne Angland
Chairwoman

#1363



United States Department of the Interior



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Tracking Numbers: 04-255

January 15, 2004

Memorandum

To: Deschutes Field Manager, Prineville USDI Bureau of Land Management, Oregon
Attn: Teal Purrington

From: Field Supervisor, Bend Field Office, Bend, Oregon *Nancy Gilbert*

Subject: Comments on the Draft Upper Deschutes Resource Management Plan and
Environmental Impact Statement [log#: 1-7-04-TA-0127]

The Fish and Wildlife Service Bend Field Office (Service) has reviewed your draft Upper Deschutes Resource Management Plan and Environmental Impact Statement (UDRMP) dated October 2003. The UDRMP analyzes the effects of a range of alternatives that address significant issues concerning the management of approximately 404,000 acres (Planning Area) of lands administered by the Bureau of Land Management (BLM). About 57% of the lands are in Deschutes County while about 36% are in Crook County.

The Service recognizes and appreciates the significant efforts made by the BLM in providing a collaborative citizen involvement approach to develop and analyze the draft UDRMP. The Service has actively participated as a member of the Deschutes Provincial Advisory Committee, and the Upper Deschutes Resource Management Plan Issue Team, to advise the BLM during the planning process.

The UDRMP examines seven alternatives, including Alternative 1 the No Action/No Change Alternative. All the action alternatives (Alternatives 2-7) provide for a variety of differing levels of multiple uses. The six action alternatives provide for different resource management emphasis and include: Alternative 2 – least overall change from current management with an

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emphasis on providing multiple uses in the same areas; Alternative 3 – increases the emphasis on reducing conflicts between human uses and wildlife habitat management objectives, and separating recreational uses; Alternative 4 – combines the approaches used in Alternatives 2 and 3, and includes a greater emphasis on providing for recreation opportunities; Alternative 5 – focuses on reduced or lower conflict activities and higher quality wildlife habitat within the urban areas, and more reliance on broad-scale conservation approaches across the planning area; Alternative 6 – emphasizes the future of effective wildlife habitat outside of the areas most likely to be affected by residential and urban development; and Alternative 7 – combines various features of the previous alternatives. It places a greater emphasis on primary and secondary wildlife habitat emphasis areas in the southeast or “rural” portion of the planning area, but also allows for increased amounts of year-round motorized use in much of the rural area. Alternative 7 is BLM’s preferred alternative, and therefore will be the focus of Service comments. We offer the following comments and recommendations to assist the BLM in completing this analysis.

The Service commends the BLM on their approach to developing the UDRMP and analyzing the complex and significant land management issues resulting from rapid population growth and subsequent increasing demands on natural resources. We concur with you that ecosystem health and diversity, including impacts to habitat and wildlife are key issues to analyze in the UDRMP. Of particular concern to the Service are the direct, indirect, and cumulative impacts to wildlife and their habitat resulting from implementation of the Preferred Alternative. The Service appreciates your efforts to assess these impacts through the use of source habitat, historic range of variability of vegetation, habitat effectiveness assessments, wildlife emphasis levels and extensive use of GIS analysis and maps. However, we have concerns that the variety of proposed activities within management areas will preclude your ability to achieve your ecosystem goal to restore and support healthy ecosystems in conjunction with vegetation and wildlife habitat needs. For example, as presently proposed the Preferred Alternative allows for extensive Off Highway Vehicle use within important habitat areas for special status species.

Our comments focus on the following issues: 1) land management implications; 2) habitat effectiveness model; 3) sage grouse and shrub steppe habitat; 4) transportation system planning; 5) wildlife emphasis; 6) juniper woodland management; 7) livestock grazing; 8) species of concern; and 9) Oregon Military Department use.

The effectiveness of habitat (i.e., habitat quality and quantity) within the Planning Area is the primary concern for the Service. The Service recognizes that the population of Central Oregon is projected to double between 1990 and 2010. The demand for amount and diversity of recreational opportunities (e.g., Off Highway Vehicle use) is expected to increase at a similar rate. During the collaborative planning process lead by the BLM to resolve significant planning issues within the planning area, it was generally recognized that wildlife habitat within BLM administered lands continues to be degraded in some areas as a result of adjacent urban development (e.g., residential development in winter range, increased year round recreational motorized activities). For these and other reasons, sage grouse, mule deer, and pronghorn have shown marked declines over the last 50 years throughout the planning area. Cumulatively, the factors presented pose a challenging dilemma to resource managers. Our ability to restore and

support healthy ecosystems in conjunction with vegetation and wildlife habitat needs, while managing for expected increases in human population and use levels (Goals, Volume 2, p. 42) will become more difficult over the life of the plan. As a result, the Service recommends that the BLM fully evaluate current habitat conditions (e.g., habitat fragmentation), wildlife trends, and cumulative effects of all activities within the planning area, and develop a focused management direction necessary to ensure ecosystem viability for the long term.

GENERAL COMMENTS

Land Management Implications

The Service supports the designation of primary wildlife emphasis level as an appropriate tool to identify areas where wildlife is one of the most important management considerations and to retain high wildlife use. However, with wildlife disturbance from roads and trails being a key concern for wildlife managers, the UDRMP has established a framework of conflicting resource management objectives between travel management designations and areas designated as primary wildlife emphasis. Conflicting resource management objectives will be difficult to manage and limit the effectiveness of the plan to meet either recreation or wildlife resource objectives.

Alternative 7 proposes to reduce or eliminate Off Highway Vehicle (OHV) use in some areas and construct extensive networks of new and loop trails in other areas. Without successful implementation of the reduction or elimination in OHV use that is called for in some areas, the adverse affects will be expanded by creating, opening, or improving OHV trails in other areas.

Service Recommendation:

The Service recommends that the BLM establish a team that includes the Service, Oregon Department of Fish and Wildlife Service, Crook and Deschutes Counties, and others, to assist you in evaluating and monitoring the implementation of the use of roads and trails. Citizen/user groups should be involved in this monitoring to bring transparency to the decision-making process. In addition, we would urge that the closures and other regulation changes be implemented and monitored for successful implementation before expanding OHV facilities/trail into other areas of primary wildlife emphasis.

Habitat Effectiveness Model

The "Habitat Effectiveness" model was used to evaluate wildlife habitat disturbance and fragmentation due to arterial, collector, and right-of-way roads. The habitat effectiveness model was modified from an elk habitat effectiveness model (Rowland et al. 2000) and applied as an index to also measure the percentage of available habitat that is usable by both sage grouse and mule deer. The Service recognizes that modeling can be an effective tool in analyzing the effects of roads and recreation trails on wildlife, and we commend you for undertaking this analysis. However, habitat effectiveness was calculated without including local roads and trails. With arterial, collector, and right-of-way roads, constituting less than one-half of the total miles of roads within the planning area, the modeling does not realistically assess wildlife impacts for

Alternatives 2-7. Additionally, the UDRMP states that user created roads proliferate: an estimated 2,000 miles of user created roads or local roads that are not maintained or officially part of an integrated transportation system occur within the Planning Area. Because many of these roads are not mapped, we would expect the model to under estimate habitat effectiveness. We concur with your guidelines to "where possible, maintain large, unfragmented patches of habitat (1,000 to 2,000 acres)", and "target low densities of open motorized travel routes (≤ 1.5 mi/mi²)".

Service Recommendations:

We recommend that the Habitat Effectiveness model be run using all roads (arterial, collector, right-of-ways) and trails, and that the UDRMP EIS assess the cumulative impacts of these roads on wildlife and habitat. Mitigation to offset direct, indirect, and cumulative adverse affects resulting from the extensive road network could be accomplished through an assessment of the user created and other roads, and closure and obliteration of targeted roads to maintain, protect, and restore habitat quality, and to create suitable wildlife habitat patch size to support wildlife, while still allowing access and recreation.

Sage Grouse and Shrub Steppe Habitat

The Service is particularly concerned with potential project impacts to the greater sage grouse (*Centrocercus urophasianus*) (sage grouse), a species petitioned for listing under the Endangered Species Act. The Service is currently conducting a 90-day review of the sage grouse petition. Populations of sage grouse have been declining throughout much of its range since the 1930s, primarily due to loss, degradation and fragmentation of habitat. Sage grouse are present within the UDRMP area.

The Prineville District began a sage grouse study within the Deschutes Resource Area in 1988. This area is located within the Planning Area. Millican Valley is considered to be an important wintering area for sage grouse, especially during the more severe winters. During the period from 1988-1993 male sage grouse experienced a significant decline. Overall population estimates were calculated in 1992 and 1993, with 611 and 514 birds respectively. Current sage grouse numbers on the study area were considered low compared to historic numbers in this area and other parts of Oregon (USDI, 1994). If BLM has updated information on the status of this population, we request that this information be included in the EIS for the UDRMP.

The Service concurs with the draft UDRMP Goals and Management Direction for Ecosystem Health and Diversity (which includes wildlife and special status species including the sage grouse). We support your commitment to implement the Greater Sage-Grouse and Sagebrush-Steppe Ecosystem Guidelines (2000) (Alternatives 2-7), and to ensure that grazing management will be implemented to meet habitat and other resource objectives. We offer our assistance in working with you on habitat management and monitoring for special status species to help ensure that projects will provide for the long-term conservation of the sage grouse and other special status species.

Activities that can adversely impact sage grouse and their habitat include agricultural conversion, rangeland conversion, including herbicide and mechanical treatments, off-highway vehicle use, livestock management including grazing and seeding, juniper encroachment, exotic species, wildfire, prescribed fire, structures, including fences, and recreational use. All of these activities occur within the Planning Area.

Service Recommendations:

The draft EIS should analyze the direct, indirect, and cumulative effects of the above mentioned affects to the sage grouse population in the Planning Area, and discuss mitigation to offset adverse impacts.

In order to provide an appropriate effects analysis for impacts of roads and trails the habitat effectiveness model and the road influence index (RII) should be run for sage grouse, deer and elk for all roads and trails.

Develop a sage grouse conservation and restoration strategy prior to expanding roads or trails within sage grouse yearlong and probable habitat areas.

Develop OHV management strategies for sage grouse use areas to maintain sage grouse habitat and use by sage grouse.

Establish an independent review process to evaluate management plan effectiveness in meeting the management goals and direction for sage grouse and their habitat.

Sage Grouse Habitat Fragmentation and Disturbance Analysis: In cooperation with the BLM, we performed a habitat fragmentation analysis within yearlong and probable sage grouse habitat within the planning area including: Horse Ridge, South Millican, North Millican, — Prineville Reservoir, and portions of Millican Plateau management areas. To complete the analysis, the BLM provided geographic information system (GIS) layers including: roads and trails, power line corridors, sage grouse range, restoration activity, and vegetation, among others. The assumption of the analysis is that the cumulative effect of roads, motorized trails, and power lines, degrade sage grouse habitat by altering the use of these habitats by inhibiting movement, causing displacement, and/or avoidance during breeding activities (February 15 – July 31).

Road densities were calculated within the sage grouse range of the planning area for both the entire road/trail network, and for arterial, collector, private and right-of-way roads (i.e., excluding local roads and trails) (Table 1). The data was summarized using the road density categories (≤ 1.5 mi/mi², 1.5 – 2.5 mi/mi², and ≥ 2.5 mi/mi²) developed in the plan.

Tables 2 and 3 summarize road densities by geographic area for all roads and arterial, collector, private, right-of-way roads, respectively. Figures 1 and 2 pictorially summarize the sage grouse fragmentation analysis for all roads and arterial, collector, private, right-of-way roads, respectively. Figure 3 provides the geographic areas (i.e., recreation management areas) within the sage grouse analysis area. The entire analysis is preliminary, and the Service looks forward to meeting with the BLM to discuss the analysis and review the findings. The Service greatly

appreciates the assistance and guidance provided by the BLM staff in the development of the analysis.

Service Recommendations:

General findings and recommendations from the sage grouse habitat fragmentation and disturbance analysis:

- 1) Sage grouse habitat is highly fragmented by roads and trails within the planning area. When including all roads and trails, only two un-fragmented patches are greater than 2,000 acres.
- 2) The identification and conservation of un-fragmented patches is important. Strategically closing roads and trails to enlarge un-fragmented patches within sage grouse habitats could be an effective conservation strategy.
- 3) Sage grouse habitat requirement (e.g., lekking and brood rearing) would be best served by strategically closing roads and trails adjacent to quality sage grouse habitats to reduce disturbance from roads and trails and maximize reproductive success.
- 4) The fragmentation of sage grouse habitat from all roads, and the arterial, collector, private, right-of-way roads, analysis indicates that the majority of the un-fragmented patches within sage grouse habitat are ≤ 250 acres. The Primary Wildlife Emphasis guidelines targets un-fragmented habitat patches of 1,000 – 2,000 acres. The largest low road density patches shown in Figures 1 and 2 warrant management attention and road closures should be strongly considered in these areas.

Based on current road densities and level of fragmentation, establish motorized seasonal use periods as closed from December 1 – July 31 within areas identified as primary wildlife emphasis for sage grouse.

Review the road network and strategically close roads to both increase un-fragmented patches, as well as, provide for quality sage grouse habitats to reduce disturbance from roads and trails.

Sage Grouse Restoration: The Service supports and encourages the implementation of projects within "Priority Sage Grouse Restoration Areas" that maintain and restore the sagebrush steppe plant community, particularly in areas that optimize conservation of the sage grouse.

Service Recommendations:

The UDRMP should provide the framework for the future establishment of a sage grouse conservation strategy to: 1) prioritize restoration actions; 2) address short and long-term restoration goals; and 3) develop a monitoring and adaptive management process to ensure sage grouse objectives are met.

Establish a mechanism in the UDRMP to implement new motorized seasonal use periods within areas restored for sage grouse.

The UDRMP EIS should analyze impacts resulting from the multiple uses proposed in the alternatives to assess the adequacy of the plans to conserve the sage grouse. Information regarding status of sage grouse within the Planning Area and monitoring information on the

condition of the range would be necessary in assessing project impacts to this species. We are concerned that without a thorough analysis of effects to sage grouse, activities under the UDRMP may further degrade important sage grouse habitat.

Transportation System Planning

The planning area is heavily roaded by all levels of routes, ranging from arterial systems to user created local roads and OHV trails. Seasonal closures for motorized travel and distance buffers have typically been the primary techniques to manage these disturbances to wildlife in the planning area. Winter range, seasonal migration corridors, breeding sites, roosting sites, and foraging habitat are some of the primary habitat components managed to limit disturbance from motorized travel.

In many locations across the planning area, road density currently exceeds 2.5 mi/mi² when considering only arterial, collector, and right-of-way roads. For example, considering only these roads, 29% of the yearlong sage grouse habitat area (North Millican, South Millican, Horse Ridge and portions within the Millican Plateau) exceeded 2.5 mi/mi². When local roads and trails are included, 58% of the yearlong sage grouse habitat area exceeds 2.5 mi/mi². These areas are adversely impacted by high road density. Seasonal closures will be necessary across large areas to effectively manage the disturbance from roads to sage grouse, pronghorn, mule deer, and elk within areas identified as primary wildlife emphasis.

Service Recommendations:

The road density target for the open road network within primary wildlife emphasis areas should be maintained at densities ≤ 1.5 mi/mi² in order to benefit wildlife and retain high wildlife use. Current road densities (including only arterial, collector, and right-of-way roads) exceed 1.5 mi/mi² in 50 percent of the total area, and exceed 2.5 mi/mi² in 30 percent of the area, respectively.

Millican Road: This road decision was removed from the EIS process by legislative direction. However the BLM needs to be aware and plan for the changes in use that will develop once the reconstruction and paving is completed. In addition to truck traffic on the route, recreationists will likely use the more accessible area for hunting, rock-hounding, hiking, biking, and OHV use. The Millican road will degrade wildlife capabilities of the area.

Service Recommendations:

An analysis of effects of the Millican Road should be included as part of the cumulative impact assessment in the UDRMP EIS.

Wildlife Emphasis

Wildlife Emphasis Levels: The UDRMP geographically identifies three wildlife emphasis levels across the planning area, and provides guidelines for each including: 1) Primary wildlife emphasis (70 percent or greater habitat effectiveness; un-fragmented patches (1,000 – 2,000 acres); and road densities ≤ 1.5 mi/mi²); 2) secondary wildlife emphasis (50 percent or greater

habitat effectiveness; un-fragmented patches (400 – 800 acres); and road densities ≤ 2.5 mi/mi²; and 3) minor wildlife emphasis (contributes to species occurrence and distribution with guidelines tied to minimum legal requirements).

Primary Wildlife Emphasis: The definition of “Primary wildlife emphasis” (Volume 2, p. 37) states “Areas allocated to primary emphasis are intended to benefit wildlife and retain high wildlife use by applying one or more of the following guidelines.” The list of guidelines includes targets for Habitat Effectiveness, un-fragmented patches, road densities and a high priority designation for restoration treatments. Please clarify what is meant by “applying one or more of the following guidelines”. We assume it is intended to be “as applicable” to each site. However, we are concerned that the language could be interpreted to mean that areas allocated to primary wildlife emphasis and are intended to benefit wildlife and retain high wildlife use could be met by applying only one of the guidelines (e.g., “rate as high priority for habitat restoration treatments”). The fact that the geographic area may be “identified” as high priority for habitat restoration treatments, should not be misconstrued to mean that primary wildlife emphasis guidelines have been met for an area.

In Alternative 7, primary wildlife emphasis areas include 100 percent of all sage grouse habitat, 73 percent of the golden eagle nesting and adjacent foraging areas, 75 percent of the elk and deer winter range, and 46 percent of the pronghorn antelope year-round habitat. The greatest overall concentration of wildlife habitat is within the southeast portion of the UDRMP (Horse Ridge, South Millican, North Millican, Prineville Reservoir, and portions of the Millican Plateau). The Service supports the premise provided by Alternative 7, to emphasize primary wildlife management within areas where there are high concentrations of important habitat for multiple wildlife species. Focusing limited resources to effectively manage and restore key wildlife habitat areas will be essential to meet UDRMP objectives for wildlife. However, the Service is concerned that although Alternative 7 allocates 100 percent of sage grouse habitat (77,601 acres) as “primary wildlife emphasis,” the majority of the sage grouse habitat is open year round to motorized use. Prior to including any additional miles of local roads and trails, Habitat Effectiveness is already below target level (Table 4-4), as is road density. Due to the heavily roaded planning area, in order to achieve the guidelines developed for primary wildlife emphasis for sage grouse (i.e., HE = 70), and provide a OHV trail network, a large amount of arterial, collector, and all administratively controlled local roads, will need to be closed seasonally as well as permanently.

Service Recommendations:

All appropriate primary wildlife emphasis guidelines for habitat effectiveness, fragmentation, road densities, and habitat restoration treatments, should be applied to ensure that future proposed actions benefit wildlife and retain high wildlife use. Actions that do not benefit wildlife or retain high wildlife use within primary wildlife emphasis areas should be modified or discontinued to retain high wildlife use within these areas.

The habitat effectiveness index of 70 percent should be maintained as the minimum level necessary to maintain primary wildlife emphasis. The declining trend of the local sage grouse population, general loss and degradation of elk and deer winter range, the high number of user

created road and trails being developed within North Millican, South Millican, and Horse Ridge, and the sometimes limited effectiveness of road closures, will require a minimum Habitat Effectiveness of 70 percent in order to provide for conditions that will ensure a benefit to wildlife and retain high wildlife use within primary wildlife emphasis areas.

Motorized seasonal use periods should be implemented for Horse Ridge, and North Millican geographic areas to be "closed from December 1st to July 31st." Without a seasonal closure and effectively closing all local roads and trails, total road densities will exceed 1.5 mi/mi² in 73 percent of the total area, and exceed 2.5 mi/mi² in 54 percent of the area, respectively.

Given the potential for damaging lands and disrupting plant and wildlife populations, we recommend establishing a monitoring protocol and adaptive management procedures in order to track authorized and unauthorized OHV use and to allow effective and timely resource management changes when necessary.

Juniper Woodland Management

Invasive Juniper Woodlands: The Service would like to work with you on the juniper woodland removal projects. We are particularly interested in the removal of junipers that have invaded sage grouse habitat that still has the habitat potential to support sage grouse. We recommend each project have site-specific analysis. We suggest that BLM convene a committee to assess the restoration potential of each site. The removal of juniper may not result in the expected repopulation by native plant species that we want reestablished. The response of the vegetation community to mechanical/fire removal of juniper will depend on the ecological resilience of each site. Results of the restoration to achieve the desired range of condition will likely be based on a number of factors including the type of fire, management practices after the fire, presence of existing non-native species (e.g. cheat grass), and soil type. Removal of junipers will not necessarily resolve the problem and initiate the natural successional process to reestablish native plant communities. Issues that may be key to successful restoration must be addressed on a site specific basis and include: 1) type of resources still present within the juniper stand; 2) type of impact fire will have on the remaining bunch grass and sage plant species; and 3) potential for an undesirable annual non-native grassland monoculture.

It is believed that natural fire regimes played a significant role in preventing juniper from invading neighboring shrub-steppe plant communities. While natural disturbance regimes remained intact, the presence of juniper was limited to rocky outcrops, low sagebrush communities, and other areas that had low fire frequencies. Over the last century, however, fire suppression, land management practices, and climatic shifts enabled juniper populations to expand.

It is apparent that the semi-arid plant communities found within the UDRMP area can be negatively impacted by juniper encroachment. Competition for light, water, and nutrients can drive grasses and forbs from invaded sites. As juniper densities increase, even native shrubs can be displaced. If invaded sites are located on slopes, the loss of understory plant species can stimulate soil erosion. Once this occurs, it can be very difficult to reestablish native plant communities even when juniper is removed by cutting or burning methods.

It is possible that many of the plant communities subjected to juniper invasion within the UDRMP have crossed a threshold, resulting in floral changes that are often irreversible. Corresponding invasions of exotic annual grasses further complicate restoration efforts.

Service Recommendations:

Juniper cutting and burning activities should be closely evaluated on a site-by-site basis. This would enable the BLM to prioritize mechanical removal and burns on areas likely to respond favorably to prescribed disturbance, such as target sites still hosting adequate densities of understory perennial bunchgrasses. The Eastern Oregon Agricultural Research Center, based out of Burns, Oregon, has done a considerable amount of research on this issue and would be a valuable asset in assisting in prioritizing juniper control efforts and prescribing follow-up treatments to maintain or enhance the ecological integrity of impacted plant communities. As mentioned above, we recommend that BLM convene a committee to assess the restoration potential of each site, and the Service would like to participate on that committee.

Old-growth Juniper Woodlands: Treatment objectives for Alternative 7 are based on restoring historic condition and range of old-growth woodlands/savanna within the planning area. Treatments include: 1) treat larger acreages to expand current range of old woodlands towards historic range; 2) thinning young juniper establishing in the interspace between the older trees; and 3) managing for reestablishing old-growth juniper in areas that they once existed. Field surveys and historical accounts should be used to estimate pre-settlement structure/composition of plant communities. The Service supports the proposed management of old-growth juniper within the planning area.

Livestock Grazing

The Service recognizes that livestock grazing is not an action being analyzed under the UDRMP. Livestock grazing is distributed across the Planning Area. Heavy grazing diminishes food supply and cover necessary for wildlife conservation and results in degraded habitats. BLM Rangeland Health Standards are a key mechanism for evaluating sage grouse habitat conditions. The Service would like the opportunity to work cooperatively with the BLM when assessments for rangeland health are being conducted within the range of the sage grouse.

Species of Concern

Oregon Spotted Frog and Riparian Habitat: The Service is concerned with potential project impacts to the Oregon Spotted Frog (*Rana pretiosa*) (spotted frog), a candidate for listing under the Endangered Species Act. Spotted frogs are almost entirely aquatic dependent, generally

found in or near a perennial water body including shallow water zones with abundant emergent or floating aquatic vegetation. Populations have been declining throughout most of its range, primarily due to the filling of shallow wetlands, degradation and fragmentation of habitat as well as the introduction of exotic predators. It is estimated that spotted frogs have disappeared from more than 80 percent of their original range. Activities that can adversely impact spotted frogs and their habitat include loss and degradation of habitat, exposure to contaminants, and exotic species introduction. A survey of the Deschutes basin failed to find spotted frogs at historic sites between Sunriver, Oregon, and the Columbia River (Hayes, 1997). Spotted frogs are present within the La Pine Management Area of the UDRMP (Bowerman and Flowerree, 2000).

The Service appreciates the opportunity to work with you on habitat management for long-term conservation of the spotted frog in UDRMP waterways.

Service Recommendations:

The EIS should analyze direct, indirect and cumulative effects on riparian and shallow water zone health, restoration, retention and expansion in regards to livestock management, wildland and prescribed fire activities, realty transactions, contaminants use, and exotic species introduction and control as they relate to spotted frogs and spotted frog habitat. Additional information regarding the current status of the spotted frog population, maps of known oviposition sites and habitat condition monitoring data along waterways within the Planning Area would be useful in assessing project impacts to this species.

Bald and Golden Eagles: Bald eagles were listed under the Endangered Species Act as an endangered species in the conterminous United States on March 6, 1967. The Pacific Northwest Management Unit of bald eagles were subsequently down-listed to threatened status on February 14, 1978. Bald eagles within this management unit have achieved most recovery goals for delisting. Within the planning area, bald eagles are generally associated with rivers and reservoirs, while golden eagles prefer open country. Nesting behaviors for both bald and golden eagles typically begin in January, followed by egg laying and incubation from February to March. Young are reared throughout April, May, and June. Fledging occurs in July and August. Both eagle species are primarily predators but also opportunistic scavengers. Management plans for bald eagles winter roosts and nest sites have not been developed by the BLM to assist in the long-term maintenance (e.g., protection from disturbance) and restoration of these critical habitats.

The Service is especially concerned about the un-authorized harassment of a golden eagle nest site from OHV users, and potentially others, along the Millican Road within the Millican Plateau. The legislative approved reconstruction and paving of the Millican Road raises additional concerns and management issues on the long term maintenance of this key habitat as a result of increases in truck traffic and OHV use adjacent to the nest.

Service Recommendations:

Develop eagle management plans for the maintenance (e.g., protection from disturbance) and restoration of these important habitat areas.

Pygmy Rabbit: As stated in the UDRMP, populations of pygmy rabbit have been declining throughout its range. Within the planning area, pygmy rabbits are most closely associated with areas supporting tall, dense clumps of Great Basin sagebrush. During most of the year, the pygmy rabbit feeds almost exclusively on the leaves of Great Basin sagebrush. However, during summer, grass may account for up to 30-40% of the diet. Loss of favorable habitat to agriculture, over-grazing, and conversion of sagebrush to exotic grasslands presents a threat to the species. Roads and cleared areas seem to be barriers to dispersal.

Service Recommendations:

We recommend that BLM conduct surveys for pygmy rabbit within suitable habitat to determine if an existing population is extant within the Planning Area. Any newly found populations should be protected and monitored.

Pronghorn Antelope: Cumulative effects of the combined activities on BLM-administered lands, and actions on other lands in and immediately adjacent to the planning area, are expected to result in a decline in pronghorn habitat quality and in the numbers of pronghorn in the Bend-Redmond, Mayfield and Millican Plateau geographic areas. This expected decline would be due to anticipated high levels of motorized use associated with high densities of roads and trails, and other impacts resulting in habitat loss, degradation, and fragmentation. Pronghorn habitat quality and numbers of pronghorn are expected to remain stable in the Badlands, Horse Ridge, North Millican and South Millican geographic areas. Recent past and current vegetation management efforts have contributed and likely will continue to contribute to suitable pronghorn habitat conditions in these areas.

Service Recommendation:

The Service is concerned with the low level (46 percent) of pronghorn antelope year round habitat that is proposed to be included within primary wildlife emphasis areas. We recommend that BLM include a higher level (above 70 percent) of year-round habitat within the primary wildlife emphasis area. We are available to work with you on this issue.

We also recommend that BLM, in partnership with other State and Federal agencies, develop a multi-species habitat conservation strategy which includes; pronghorn antelope, sage grouse, mule deer, elk and golden eagles within and adjacent to the UDRMP. The strategy should address habitat quality and quantity, travel corridors, winter range, seasonal use areas, social conflicts and environmental constraints related to wildlife, and the goals and management direction outlined in the UDRMP.

Oregon Military Department Use

Alternative 7 allows for expansion of military training from the existing 29,744 acres to 50,600 acres (13 percent of the Planning Area). The UDRMP states that "Alternative 7 also promotes the restoration of the area by making additional lands available for permanent and temporary use". Please clarify what is meant by this sentence. It is our understanding that the general logic is that spreading the impact across a larger area would reduce the concentration of the impact on a single area. Three rotational training areas would be designated and available for

training for an estimated three years per area (totaling 20,054 acres). Appendix A of the UDRMP states that the rotational training areas would be selected from BLM lands that have been previously disturbed, are overused and in need of restoration. The Service is concerned that the Preferred Alternative will increase the impact of military training on wildlife and their habitat across a significantly larger area. There is not sufficient information to determine whether the three year rotational scheme will allow the vegetation and damage to soils sufficient time to recover. The UDRMP states that the military could provide funding to help restore areas that are "heavily impacted by recreational activity", to restore soil conditions, juniper removal, road rehabilitation, assist BLM in deterring vandalism, and clean up of dumping across a broader area. We are unable to determine the effectiveness of this proposed mitigation to utilize military funds and partnership to restore and revegetate areas due to the lack of information in the UDRMP as to what this proposal consists of.

Service Recommendation:

We recommend that the EIS include: 1) a complete analysis of the direct, indirect, and cumulative impacts associated with the military activities including long term effects of tracked vehicles and other training activities on soils, vegetation, and wildlife, including impacts to pronghorn antelope winter range; 2) a description and assessment of the success of the mitigation restoration that has been completed by the military on the existing training facility; and 3) specific mitigation measures proposed to offset impacts, including the projected acreage of restoration that is anticipated will be implemented on a yearly basis. This information should include generalized restoration plans including: a) plant species to be used, and from where the genetic stock is derived; b) patch size and density of planting consistent with the vegetation community to be restored; c) planting methodology including time of year; d) control of exotic vegetation; and d) monitoring and reporting. We recommend that locally collected native seed be used in the revegetation efforts.

We recommend that the BLM impose restrictions on the use of areas that are heavily impacted by recreational activity or dumping, rather than relying on the military to mitigate those impacts.

We appreciate the opportunity to comment on the UDRMP. The Service supports the BLM's efforts to provide a comprehensive framework for managing the BLM-administered public lands. We would like to work with BLM to further protect and enhance fish and wildlife species and their habitat in Central Oregon. If we can be of any assistance, or if you have any questions regarding these comments, please contact me or Jerry Cordova at (541) 383-7146.

Attachments

cc: Brian Ferry, ODFW, Prineville, OR
Glen Ardt, ODFW, Bend, OR

References

Bowerman, J. and L. Flowerree. April 2000. A survey of the Oregon spotted frog in the area between Sunriver and La Pine, Oregon. Prepared for the U.S. Fish and Wildlife, Oregon Department of Fish and Wildlife, and Sunriver Owners Association.

Hayes, M.P. 1997. Status of the Oregon spotted frog (*Rana pretiosa sensu stricto*) in the Deschutes Basin and selected other systems in Oregon and northeastern California with a range wide synopsis of the species' status. Final report prepared for the Nature Conservancy under contract to the US Fish and Wildlife Service, 26000 SE 98th Avenue, Suite 100, Portland Oregon, 97266. 57 pp. +appendices.

Rowland, M.M., M.J. Wisdom, B.K. Johnson, and J.G. Kie. 2000. Elk distribution and modeling in relation to roads. *Journal of Wildlife Management* 64(3):672-684.

U.S. Department of the Interior. 1994. Sage grouse in the high desert of Central Oregon: Results of a Study, 1988-1993.

TABLE 1**Sage Grouse Habitat excluding Private Lands**

	Acreage	Percentage of Total Habitat Acreage
Yearlong	46395	39%
Probable	72072	61%
Total Acres	118467	

Road Density Acres of**Sage Grouse Habitat excluding Private Lands
Using ALL ROADS ANALYSIS**

Road Density Category	Acreage	Percentage of Total Habitat Acreage
0 - 1.5 mi/mi ²	36310	31%
1.5 - 2.5 mi/mi ²	20987	18%
> 2.5 mi/mi ²	61171	52%

Road Density Acres of**Sage Grouse Habitat excluding Private Lands****Using ARTERIAL, COLLECTOR, PRIVATE, AND PRIVATE ACCESS ROADS ANALYSIS**

Road Density Category	Acreage	Percentage of Total Habitat Acreage
0 - 1.5 mi/mi ²	72002	61%
1.5 - 2.5 mi/mi ²	23987	20%
> 2.5 mi/mi ²	22478	19%

**Sage Grouse Habitat (Both Yearlong and Probable)
Listed by Recreation Management Area**

NAME	Acreage	
Badlands WSA	1353	1%
Horse Ridge	22813	19%
Millican Plateau	7045	6%
North Millican	47853	40%
Prineville Reservoir	21272	18%
Research Natural Area	608	1%
South Millican	17607	15%
Total	118552	

TABLE 2

**Road Density of Sage Grouse Habitat (Both Yearlong and Probable)
Using ALL ROADS ANALYSIS
Listed by Recreation Management Area**

NAME	Road Density Category	Acreage	Percentage of Total Habitat Acreage
Badlands WSA	0 - 1.5 mi/mi ²	728	1%
	1.5 - 2.5 mi/mi ²	106	0%
	> 2.5 mi/mi ²	512	0%
Horse Ridge	0 - 1.5 mi/mi ²	6009	5%
	1.5 - 2.5 mi/mi ²	4574	4%
	> 2.5 mi/mi ²	12200	10%
Millican Plateau	0 - 1.5 mi/mi ²	3578	3%
	1.5 - 2.5 mi/mi ²	996	1%
	> 2.5 mi/mi ²	2463	2%
North Millican	0 - 1.5 mi/mi ²	13909	12%
	1.5 - 2.5 mi/mi ²	9034	8%
	> 2.5 mi/mi ²	24907	21%
Prineville Reservoir	0 - 1.5 mi/mi ²	9973	8%
	1.5 - 2.5 mi/mi ²	4266	4%
	> 2.5 mi/mi ²	7026	6%
Research Natural Area	0 - 1.5 mi/mi ²	106	0%
	1.5 - 2.5 mi/mi ²	124	0%
	> 2.5 mi/mi ²	379	0%
South Millican	0 - 1.5 mi/mi ²	2007	2%
	1.5 - 2.5 mi/mi ²	1887	2%
	> 2.5 mi/mi ²	13684	12%

TABLE 3

**Road Density of Sage Grouse Habitat (Both Yearlong and Probable)
Using ARTERIAL, COLLECTOR, PRIVATE, AND PRIVATE ACCESS ROADS ANALYSIS
Listed by Recreation Management Area**

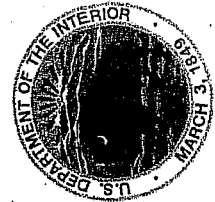
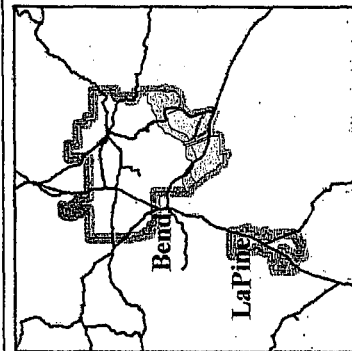
NAME	Road Density Category	Acreage	Percentage of Total Habitat Acreage
Badlands WSA	0 - 1.5 mi/mi ²	728	1%
	1.5 - 2.5 mi/mi ²	207	0%
	> 2.5 mi/mi ²	416	0%
Horse Ridge	0 - 1.5 mi/mi ²	11416	10%
	1.5 - 2.5 mi/mi ²	5458	5%
	> 2.5 mi/mi ²	5910	5%
Millican Plateau	0 - 1.5 mi/mi ²	4390	4%
	1.5 - 2.5 mi/mi ²	1184	1%
	> 2.5 mi/mi ²	1465	1%
North Millican	0 - 1.5 mi/mi ²	26477	22%
	1.5 - 2.5 mi/mi ²	11966	10%
	> 2.5 mi/mi ²	9406	8%
Prineville Reservoir	0 - 1.5 mi/mi ²	17665	15%
	1.5 - 2.5 mi/mi ²	2074	2%
	> 2.5 mi/mi ²	1527	1%
Research Natural Area	0 - 1.5 mi/mi ²	522	0%
	1.5 - 2.5 mi/mi ²	56	0%
	> 2.5 mi/mi ²	30	0%
South Millican	0 - 1.5 mi/mi ²	10803	9%
	1.5 - 2.5 mi/mi ²	3041	3%
	> 2.5 mi/mi ²	3724	3%

Figure 1
BLM - UDRMP Sage Grouse Habitat
Road Density - Using All Roads

DESCHUTES **CROOK**



Locator



Scale 1:300,000

Road Density study area includes Yearlong and Probable Habitat

- Sagegrouse Leaks
 - ART
 - COL
 - LOC
 - Unknown
 - Wilderness Study Area
 - County Boundary
 - UDRMP Boundary
 - Major Highways
 - OHV Trails - SageGrouseHab
- Road Density**
- 0 - 1.5 mi/mi²
 - 1.5 - 2.5 mi/mi²
 - > 2.5 mi/mi²

Data provided by
 Prineville BLM GIS

Data compiled from various
 sources and may not meet
 National Map Accuracy
 Standards.

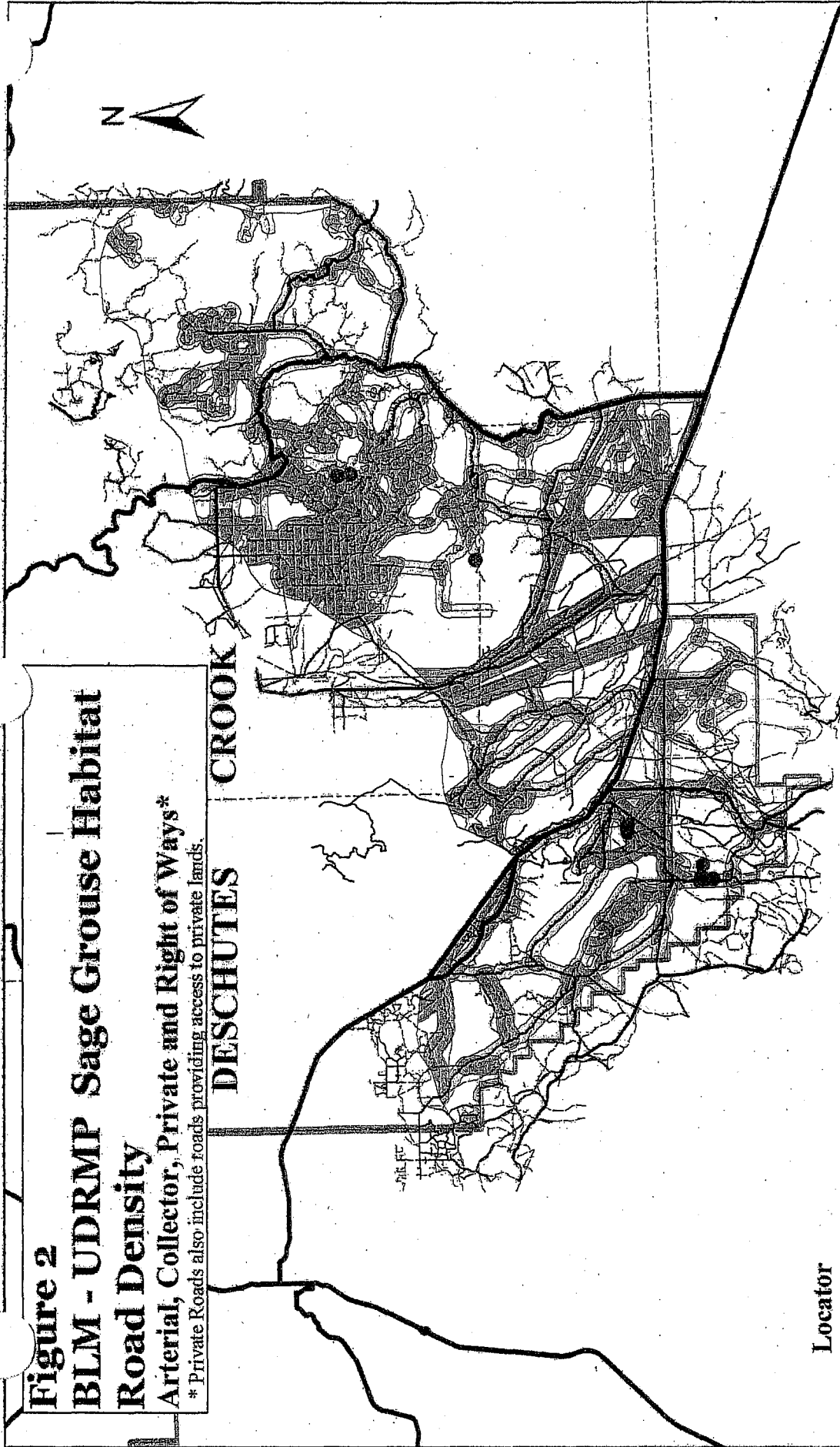
Printed Jan. 14, 2000

Figure 2 BLM - UDRMP Sage Grouse Habitat Road Density

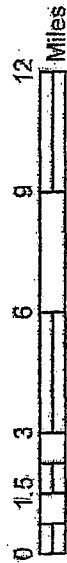
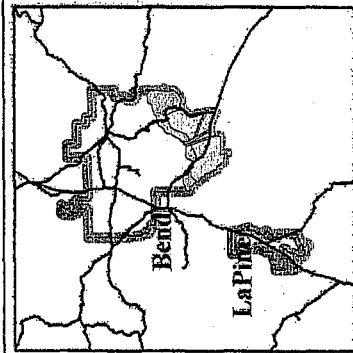
Arterial, Collector, Private and Right of Ways*

* Private Roads also include roads providing access to private lands.

DESCHUTES CROOK



Locator



Scale 1:300,000

Road Density study area Includes Yearlong and Probable Habitat

- Sagegrouse Leks
- ART
- COL
- LOC
- Unknown
- Wilderness Study Area
- County Boundary
- UDRMP Boundary
- Major Highways
- OHV Trails - SageGrouseHub

Road Density

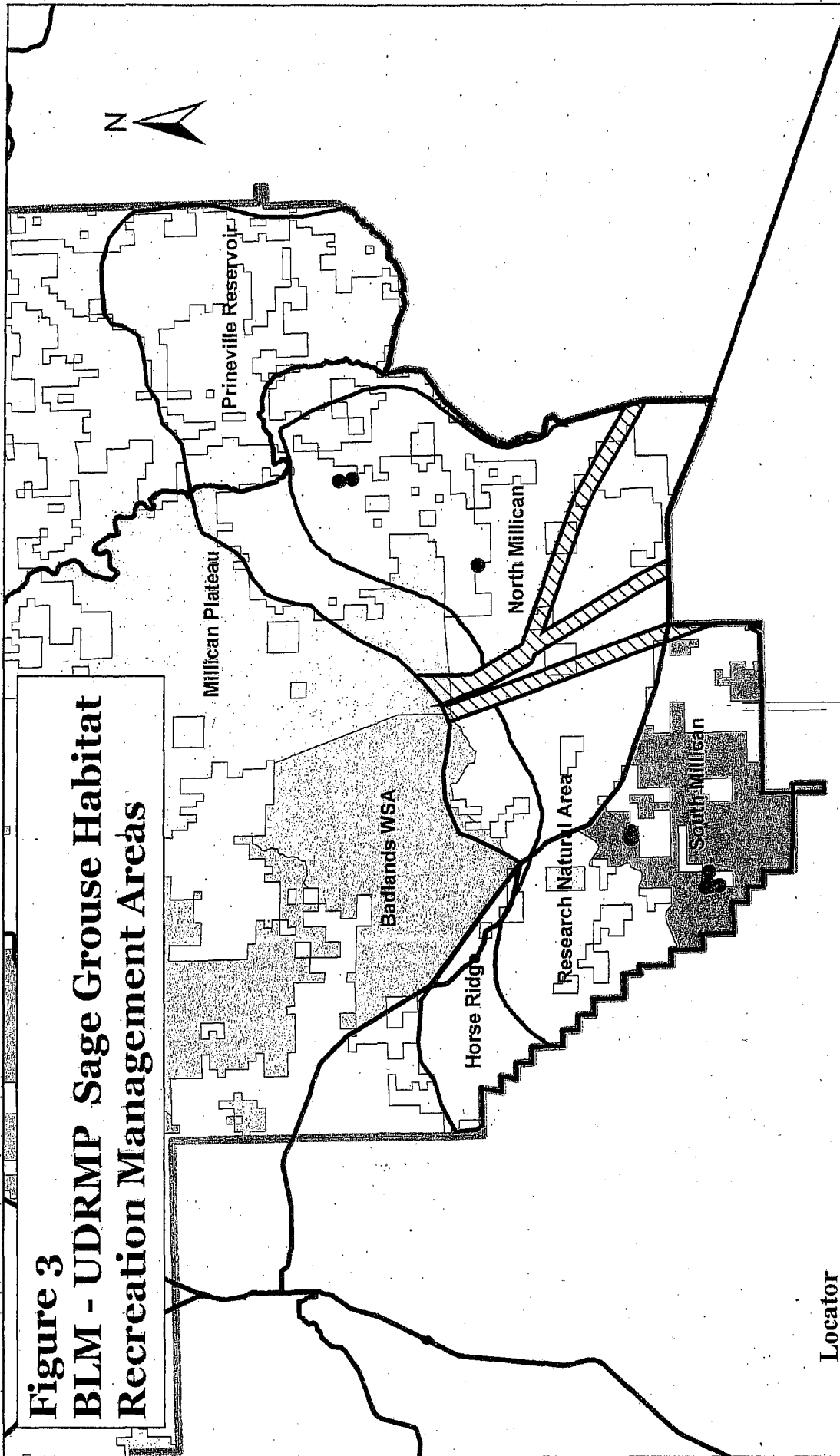
- 0-1.5 mi/mi²
- 1.5-2.5 mi/mi²
- >2.5 mi/mi²

Data provided by
Prineville BLM/GIS

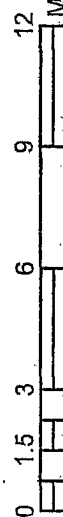
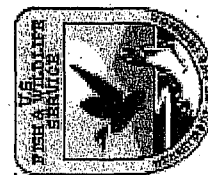
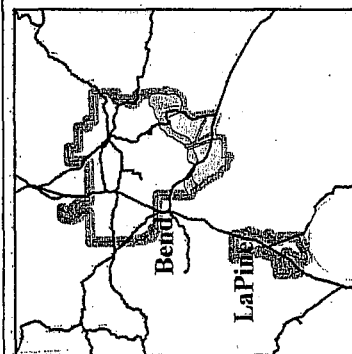
Data compiled from various
sources and may not meet
National Map Accuracy
Standards.

Printed Jan. 14, 2004

Figure 3
BLM - UDRMP Sage Grouse Habitat
Recreation Management Areas



Locator



Scale 1:300,000

- Sagegrouse Leks
- Major Highways
- Sage Grouse Habitat**
 - YearLong
 - ProbableHabitat
 - ▨ NonHabitat PowerLine
 - UDRMP Boundary

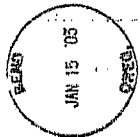
Data provided by
 Prineville BLM GIS

Data compiled from various
 sources and may not meet
 National Map Accuracy
 Standards.

Printed Dec. 17, 2000

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
BEND FIELD OFFICE
20310 EMPIRE AVENUE
BEND, OREGON 97701

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#1313

Bureau of Land Management
3050 NE Third St
Pendleton, OR 97454

Allen Teal Huntington

#1364

RECEIVED

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St
Prineville, Oregon 97754

JAN 30 2004

BLM PRINEVILLE
DISTRICT

RE: Upper Deschutes Resource Management Draft

As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon.

The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed.

The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents.

Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually – the increasing use is not reflected in the severe limitations to OHV use on BLM land.

Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to put trails out for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Print Name GARY SCHAFFER

Address 1470 N.E. 1ST ST. STE. 600 BEND, OR

Signed [Signature]

97701

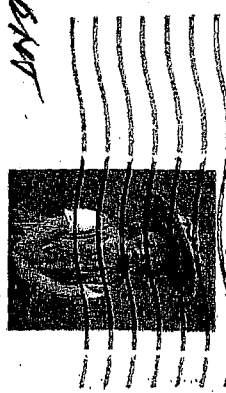
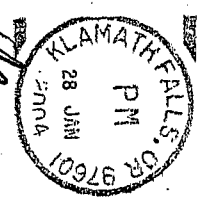
O. Schaffner
1470 N.E. 1st St.
Bend, OR 97701

Bureau of Land Management

ATT: TBAE BARRINGTON
3050 N.E. 3rd St,

Prineville, OR
97754

#1364



MARY CASSATT USA37

#1365

RECEIVED

JAN 20 2004

BLM PRINEVILLE
DISTRICT

January 5, 2004

Bureau of Land Management,
Prineville District Office
3050 NE Third St
Prineville, Oregon 97753

Upper Deschutes RMP Team,

As a concerned citizen that recreates in Oregon I would like to be on record as supportive of motorized recreation on BLM lands in Oregon, especially Central Oregon.

The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

I do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? This is especially critical for the Lapine and Prineville area residents.

Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually – the increasing use is not only not reflected in the severe limitations proposed for OHV use on BLM land, it appears to be prejudicially discriminated against.

Please adopt a more flexible road trail density criteria to allow for the best use of the land, and for a designated trail system that will succeed. Micromanaging your areas and attempting to designate different trails for several different uses in the same areas management will fail, and ultimately our use will suffer further restrictions.

BLM Upper Deschutes Resource Management Draft – Specific area issues, and objections;

In regard to Cline Buttes:

Pecks Milkvetch ACEC expansion – not what general consensus was during issue team discussions. Increase of 6,000 acres impacts historical OHV use to an unacceptable level.

Separate systems for motorized and nonmotorized is not realistic and a prescription for failure. It will polarize the users, decrease every ones area of usage, does not support a multiple-use philosophy, micromanages the area, and will increase conflicts among users. You should be questioning the goals your agency followed that led you to propose a "solution" such as this.

The management direction in Alt. 7 is unrealistic and beyond the scope of BLM administrative resources.

The Tumalo canals are thought to be some of the best riding areas in the area and too important to the users to close.

The Plan will not accommodate current use in Cline Buttes, and does not address increased use/demand for the life of the plan. This is not logical, and it is not good scientific problem solving.

The Interim Plan is not defined enough for comment.

In regard to Lapine:

Closure of historically open designation in all of BLM land bordering Lapine, except Rosland Play area is not possible to implement with current resources nor necessary for wildlife concerns. Wildlife does not need ALL of the planning area. Area residents will be dramatically impacted without due cause.

Snowmobiling needs to be exempt from the limitations completely.

In regard to South Milican:

Issue team discussion of the area proposed an increase in the seasonal use that is not noted in Alt 7. August thru April would be a necessary addition to recreational opportunities considering all the recreational opportunities Alt 7 takes from motorized recreation and it would not negatively impact wildlife concerns.

In regard to Badlands:



This area is not critical habitat or deer winter range and ODF & W did not have issue with usage in the Badlands. If wildlife concerns are minimal, it is not good management to close it to OHV use due to social issues unrelated to the use, i.e., fence cutting, garbage dumping, partying and illegal hunting. The issue is inadequate on-the-ground management by your agency. Own it, and fix it.

In regard to Prineville Reservoir:

Managing current OHV use by closure without any recreational opportunities is unwarranted.

There are many opportunities for improvement in this for us all. I look forward to discussing the upcoming OHV actions in the final management plan with you.

Sincerely,

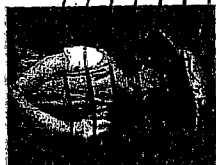



Jim and Donna Green
5313 Highway 66,
Ashland, OR 97520
E-mail: greenmeadowsinc@cs.com

Jim & Donna Green
5313 Highway 66
Ashland, OR 97520

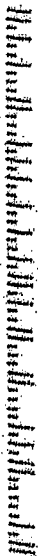
Bureau of Land Management,
Prineville District Office
3050 NE Third St
Prineville, Oregon 97753

#1365



MARY CASSATT USA37

57753412300



#1366

Bureau of Land Management
Prineville District Office
3050 N. E. Third St.
Prineville, OR 97753

January 14, 2004

Attention: Teal Purrington

RECEIVED

RE: Upper Deschutes Resource Management Draft EIS

JAN 20 2004

Dear Sir or Madam:

BLM PRINEVILLE
DISTRICT

I am writing not because I ride a motorcycle or an ATV. My personal interests are in fishing, snowmobiling and hiking. I focus on sharing these experiences with my grandchildren and soon great grand children. I began introducing my children and their friends to the outdoors nearly 40 years ago. I am writing because I am increasingly alarmed at the growing efforts of land management agencies to limit, restrict and close access to historic recreational pursuits.....especially now that age and health begin to reduce my dependance on muscle power. I firmly believe in the importance of introducing our children to their connection to and dependance on the land and teaching them the respect for the land that will carry into their adult life. Please don't further restrict my ability to do that.

To begin with, I wish to go on record as being supportive of multiple use including motorized recreation and of realistic access for all users.

The Upper Deschutes Resource Management Plan Draft EIS preferred alternative as written does not address the need to accommodate growth in motorized recreation. Readily available sales statistics will tell you that ATV sales are outstripping all other recreational sales nationally. Rafting and canoeing are also fast growing pursuits in Oregon. The "carrying capacity" work done in the last few years will tell you this recreating public requires more space, not less. We need more and larger staging areas and we need trails of varying degrees of difficulty and length. I'm speaking of all kinds of trails, ATV, motorcycle, four wheel drive, snowmobile, bicycle, hiker, horse and water. Multiple use might mean a summer horse-motorcycle trail is a snowmobile trail in the winter. Adequate staging and parking areas are also a requirement. Given the above assumptions, why in the world would a preferred alternative propose a reduction in trails and in access?

Is the lack of any mention of four-wheel-drive trails an oversight? If so or if not, these users should be included and their needs addressed in the final EIS.

The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. Alternative #7 proposes an aggressive vegetation management plan for the Juniper woodlands that will negatively impact a proposed trail system.. Vegetation can provide barriers and require twists and turns that make a trail much more interesting if not challenging.

I earlier mentioned I am a snowmobiler. Please take note that #1, I object to the closure of the historically open designation of all BLM land bordering Lapine except the Roseland Play area and #2, I especially object as regards to snowmobiles. The Deschutes National Forest wrote a Wild and Scenic River plan that would have imposed a similar closure a few years ago. Following a review of the Memorandum of Understanding between the Forest Service and The American Council of Snowmobile Associations the Forest Service agreed to continue the open designation with a commitment from local clubs to monitor for damage or degradation.

It appears Alternative #7, proposes closure as a way to manage high use or problem areas. In other words abdicate rather than manage. This observation applies to Lapine and to Prineville reservoir. Motorized access and recreation in these areas should probably be more intensely managed but elimination is the easy way out. Just

because your job is complicated or difficult doesn't mean you give it away. It makes more sense to increase opportunities around population centers rather than reduce opportunities around population centers.

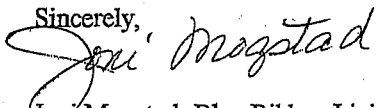
I do not support the Alternative #7 proposal to close the Badlands. The presence of a WSA is not an excuse to change use patterns. It is a reason to provide intensive maintenance of existing systems. I recently listened to a talk by O.S.U. Dean Hal Salwasser in which he concluded

"Don't let philosophy masquerading as science fool you." Is that what we have here? I see no scientific reason to close Badlands.

Please keep me advised of the progress of the Upper Deschutes Resource Management Plan and remember Multiple Use.

Thank You.

Sincerely,



Joni Mogstad, Blue Ribbon Liaison
Oregon State Snowmobile Association
4797 Old Dillard Road
Eugene, OR 97405

(Sent earlier via E-mail)

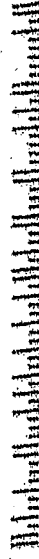
Mogstad
4799 and Dilard Rd
Eugene, Oregon 97405



Bureau of Land Management
Prineville District Office
3050 N.E. Shuid Street
Prineville, OR 97753
#136a

Attn: Teal Dunnington

97754-2500





#1367

891 Safstrom Drive
Idaho Falls, ID 83401
January 13, 2004

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JAN 20 2004

Bureau of Land Management
Prineville District Office
3050 NE Third St
Prineville, OR 97753
Attention: Teal Purrington

BLM PRINEVILLE
DISTRICT

RE: Upper Deschutes Resource Management Draft EIS

Dear Ms. Purrington:

The BlueRibbon Coalition is a nationwide organization representing 600,000 motorized recreationists, equestrians, and resource users. We work with land managers to provide recreation opportunities, preserve resources, and promote cooperation with other public land users. Following are our comments on the Draft Environmental Impact Statement for the Upper Deschutes Resource Management Plan (DEIS).

Our members and member organizations in central Oregon have participated extensively in the DEIS public process, which was lengthy and sometimes arduous. After volunteering so much time in good faith, they are now frustrated that the DEIS does not reflect more of their effort. We offer the following comments in hopes that the document's deficiencies can be corrected in the final version:

- Crucial information which should have been available, and which should have formed the basis of the selected alternative, was either not obtained or used by specialists. For example: road and trail densities, locations, and mileages; impacts of current use. We hope that more of this information is appropriately integrated into the final.
- Apparently, important consequences of implementing the presented alternatives (including the selected) were not discussed or analyzed as required by NEPA. For example: Displacement of recreation and its related impacts to other areas; decrease in opportunity as the OHV population expands; impacts of changing from an open system to a designated trail system.
- The DEIS projects that its extensive proposed changes will be funded with the participation of the OHV community through state funds. Unless the final plan enjoys broad support from the OHV community, there will be a reluctance to partner to the degree projected. The funds upon which the plan implementation depends may not materialize if significant changes are not made.

- Our members are concerned about wildlife population targets.
- There is a danger that the interim plan may become "final" if firm deadlines are not an integral part of the final plan.
- Our members have expressed concern that the DEIS' discussion of environmental consequences is disorganized and difficult to understand. Better organization and clarity of presentation may alleviate a few of our concerns about sufficient analysis of the environmental consequences.

Our members and member organizations have supplied excellent information to you, both in written comment and in numerous meetings, regarding the specifics of certain areas such as Cline Buttes, Prineville Reservoir, and Juniper Woodlands. We urge that the final plan adopt their excellent suggestions. Please remember that for any plan to be successfully implemented it needs the ownership and support from the users. It is not too late to make the changes needed to the Upper Deschutes Resource Management Plan to make it a win-win plan.

I appreciate your serious consideration of my comments. Please keep me informed.

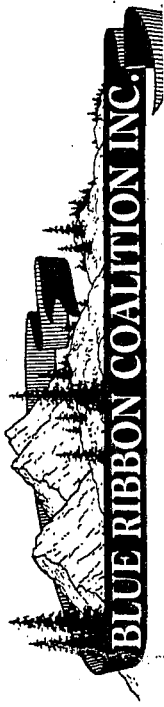
Sincerely,



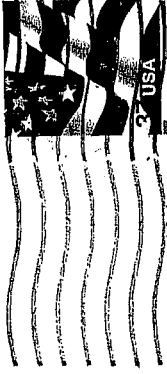
Adena Cook, Public Lands Consultant

Phone: 208-522-7339

e-mail: bradena@sharetrails.org



Adena Cook, Public Lands Consultant
BlueRibbon Coalition
891 Safstrom Drive
Idaho Falls, ID 83401



Bureau of Land Management
Prineville District Office
3050 NE Third St
Prineville, OR 97753
Attention: Teal Purrington

#1367

RE: Upper Deschutes Resource Management

97754-2300

#1368

Prineville Resource Area
Bureau of Land Management
ATTENTION: Draft Upper Deschutes RMP
3050 N.E. Third Street
Prineville, OR 97754

RECEIVED

JAN 20 2004

BLM PRINEVILLE
DISTRICT

January 10, 2004

Area Manager:

Desert Survivors is a non-profit desert conservation organization based in Oakland, California. Desert Survivors has an interest in the lands governed by the Prineville Field Office of the Bureau of Land Management (BLM). Desert Survivors leads educational and recreational excursions on Bureau of Land Management lands, including those governed by the Prineville Field Office, as part of its responsibility as a California public benefit, non-profit corporation. Desert Survivors has an interest in seeing BLM lands, both Wilderness and non-Wilderness, continue in a natural and pristine condition. Desert Survivors has 800 members.

I have read your Draft Upper Deschutes RMP and am concerned about the level of off-road vehicle use that is proposed. Closing 22% of Resource Area lands to off-road use is good, but what about the other 78%? Off-road vehicle use is one of the most destructive forces on our public lands, and the damage caused lasts a long time. The vehicles create visual eyesore and an ungodly racket wherever they are allowed. And the users don't care at all about the needs or desires of others for peace and quiet, not to speak of freedom from having to witness their destructive effects.

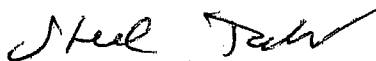
Desert Survivors urges you to curtail abuse by such vehicles in your Resource Area and to put more restrictions into your Management Plan. I would say that reversing the figures would be a good start: 22% of the area with use on designated roads, 78% closed to ORVs. That would serve the rest of us.

Hunters, fishermen, tourists, retirees, backpackers, birdwatchers, Boy Scouts, wildlife biologists, rock hounds, photographers, sightseers and many others use these lands. We don't want to give them up to the privileged few with big ugly dirt machines that tear up the land and leave it shredded for future generations.

You have put no new plan for enforcing restrictions on ORV violators into your document. That's reason enough to turn the figures around. Keep the abusers bottled up in as small an area as possible.

Please send me a copy of your Final Plan.

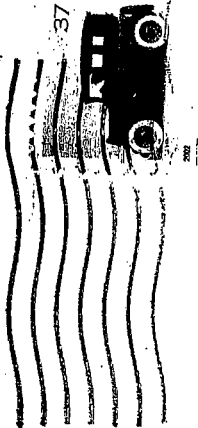
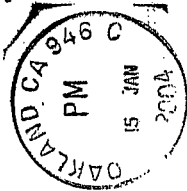
Steve Tabor, President
Desert Survivors
P.O. Box 20991
Oakland, CA 94620-0991



Phone: (510) 769-1706



Steve Tabor, President
Desert Survivors
P.O. Box 20991
Oakland, CA 94620-0991



#1368

Prineville Resource Area
Bureau of Land Management
ATTENTION: Draft Upper Deschutes RMP
3050 N.E. Third Street
Prineville, OR 97754

57754+2500



1369

OREGON MILITARY DEPARTMENT
HEADQUARTERS, OREGON NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

January 15, 2004

RECEIVED

Ms. Teal Purrington
Bureau of Land Management
3050 NE Third Street
Prineville, Oregon 97745

JAN 20 2004

**BLM PRINEVILLE
DISTRICT**

Dear Ms. Purrington:

In response to the public comment period for the Bureau of Land Management's Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement (UDRMP-EIS), and as a cooperating agency, the Oregon Military Department presents the following general comments and the attached detailed list of review comments on the Draft UDRMP-EIS. The Oregon Military Department provides its reserved endorsement of the UDRMP-EIS and specifically a reserved endorsement of the BLM's preferred alternative, Alternative 7. The Oregon Military Department has reservations concerning the UDRMP-EIS and the alternatives based on what this Department interprets as weaknesses and inconsistencies within the UDRMP-EIS.

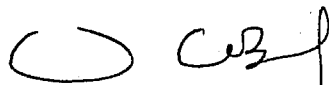
The goal of the Oregon Military Department is to obtain a long-term land use agreement with the Bureau of Land Management for the cooperative use of the Biak Training Center in central Oregon. The Oregon Military Department requires a maneuver training area within the State of Oregon to train mechanized, mounted and dismounted National Guard units to support their State and Federal missions. Currently the Oregon Military Department has no other comparable training site to the Biak Training Center in Oregon. Comparable out of state maneuver training areas are cost prohibitive and movement times to and from such out of state locations result in the loss of effective training time and will increase maintenance costs on vehicles and other equipment, resulting in an overall decrease in the effective readiness of Oregon National Guard units to fulfill their mission requirements. The indirect consequence of the loss of effective maneuver training land within Oregon is a decrease of the Oregon National Guard's readiness to meet State and Federal missions and emergency plans. Consequently the BLM's proposed action affects the overall public health and safety and negative effects on National Guard readiness may present inconsistencies with State and Federal plans and programs. The BLM's purpose and need statement regarding the Oregon Military Department and National Guard inadequately addresses this goal.

As a cooperating agency, representatives of this Department have repeatedly stated, through the BLM's Issue/Interest Team, the BLM's Interagency Interdisciplinary Team, and the South Redmond Area Collaborative Planning Group, this Department's position that we cannot effectively evaluate a land allocation decision by the BLM without also knowing the specific Terms and Conditions to be placed on military training activities. This Department considers the land allocation, the length of the land allocation agreement, and the specific Terms and Conditions of use as being intrinsically related. However as a cooperating agency, this Department had no visibility or input into the development of the BLM's Management Direction contained in Volume III of this UDRMP-EIS and was afforded no

opportunity to review or comment on BLM Management Direction until this public comment period. Based on a meeting with Mr. Barron Bail, BLM District Manager, in 2003 we were under the impression that this Department would be afforded the opportunities normally associated with common courtesy of a cooperating agency. This was not the case with respect to Volume III that contains the standards and guides of this plan. While the Oregon Military Department supports the general BLM intent and goals established for the UDRMP-EIS, there are a number of inconsistencies and problems that still need to be clarified and resolved. For example, in the BLM's management direction statements common to all alternatives, both in Volume II and III, the Bureau states that any military land use agreement will ensure consistency with "environmental requirements". Yet the BLM does not provide a complete listing of those "environmental requirements". Another example, while the BLM provides for the allocation of remote rotational training areas in Alternatives 6 and 7, within the Standards and Guides contained with Volume III, the BLM designates the Steamboat Rock area as being "closed to full size vehicles", thus simultaneously closing this area to most potential military training activities. Consequently, the Oregon Military Department will have to further assess the viability of using this area to determine if it meets the needs of the Oregon National Guard. Likewise, BLM designates other lands for military use but then under BLM recreational or transportation management direction also either restricts off highway vehicle use to designated roads and trails or designates most roads for potential closure, effectively cutting access to those areas at some future time. Based on these examples, the Oregon Military Department can provide only a limited and reserved endorsement of the BLM's Draft UDRMP-EIS as currently written.

The Oregon Military Department requests that the BLM meet and consult with this Department to resolve and clarify issues regarding the Draft UDRMP-EIS. The Department requests, in accordance with 43 CFR §1610.3, that the BLM Area Manager notify and identify for this Department inconsistencies between the UDRMP-EIS and related National Guard and State "plans, policies, or programs". We will continue to cooperate with the BLM to identify the inconsistencies within the plan and work to resolve them in a manner consistent with the stated requirements and the needs of this agency. I am forwarding copies of this letter to Mr. Jim Brown and Mr. Lance Clark of the State Governor's office.

Sincerely,



RAYMOND C. BYRNE JR.
Brigadier General
Acting Adjutant General

Enclosure

#1369

Volume I				
Vol.	Page	Para.	Sent.	Comment
I	xxiii	2	-	Oregon Military Department (OMD) agrees with the BLM's statement that OMD has land management responsibilities within the planning area, specifically the Biak Training Center, and will be using this environmental analysis to support future OMD or Oregon National Guard (ORNG) decisions.
	xxxii		-	OMD agrees with the BLM's guidance statement providing for long-term shared use of the BLM administered lands by the ORNG
	xxxv	5	3	OMD agrees with BLM's rationale for identification of the preferred alternative to meet "long-term military training needs" are concerned in so far as the land allocation decision is identified within the preferred alternative. While this document develops "Standards and Guides" regarding that long-term use, it does not identify for the OMD what training activities would be considered appropriate in the future for any specific land area.
Volume II				
Vol.	Page	Para.	Sent.	Comment
II	8	2	2-3	While OMD agrees with the BLM's statement that high road and trail densities "can" break up wildlife habitat, the numeric density threshold and extent to which primitive roads and trails do break up wildlife habitat in the UPDRMP high desert environment is not clearly understood. Additionally, OMD believes that frequency of use, as addressed in the next paragraph, is also a factor but that these factors are interrelated, are semi-dependent variables, and could be inversely related.
	13	4-6	-	OMD believes that this "Purpose and Need" statement regarding the "Oregon Military Department and National Guard" is inadequate. The statement does not identify the need of the OMD to maintain a large training maneuver area within the State of Oregon for the purpose of training National Guard troops and maintaining troop readiness in support of State and national missions to include State emergencies effecting the public health and safety. This purpose and need statement does not identify the issue that there is no comparable maneuver training area within the State of Oregon. The purpose and need statement also inadequately addresses the need for a long-term (30 year) land use agreement for training lands in order to appropriately obtain congressional funding to adequately resource the Training Center in terms of program, manpower, and equipment. Programs include the Integrated Natural Resource Management Plan for the purpose of maintaining the natural setting of the Training Center, the Integrated Cultural Resources Management Plan the protection of archeological resources, and the development of the Integrated Wildland Fire Management Plan for the protection of resources and the local communities from wildland fire.
	13	5	2	Change sentence to read as follows: "Noise and dust from training may disturb ..."
	23	7	1	Change sentence to read as follows: "The Oregon Military Department recently completed both an Integrated Natural Resources Management Plan and an Integrated Cultural Resources Management Plan that guide their resource activities within the permit area."
	26	7	3	Change sentence to read as follows: "Public land use supports the military training purposes of the Biak Training Center where those activities are consistent with public natural and cultural resource objectives and provide a reliable long-term land base for training operations."
	26	7	3	Change name to read: "Biak Training Center". This may be a global change within the documents.
	39	4	5	See comment above for Volume I, page xxxv, paragraph 5, sentence 3.
	53	7	-	OMD agrees with BLM's general management direction statement common to all alternatives with respect to "Military Uses". However, OMD requests BLM to clarify or reference in this statement the source or location of the "environmental requirements" within this document or the procedures to establish such in the future before OMD can knowingly fully accept this management statement.

Vol.	Page	Para.	Sent.	Comment
II	80	1	5-6	This Wagon Roads ACEC management direction is consistent with the Biak Training Center's current INRMP, ICRMP and SOP regarding the Horner Road and can be extended by OMD to the Bend-Prineville Road. Current Biak SOP calls for a restriction on the Horner Road to light wheeled vehicles only and in convoys of four or few vehicles together.
	80	2	3-4	Historic and current BLM and OMD management allows for military off road wheeled vehicle use in the vicinity of these roads. OMD requests the continuation of this management policy and in turn can provide for additional specific mitigation actions within the Wagon Roads ACEC. Such a variance within this ACEC would be consistent with management direction common all action alternatives described on page 87. Such a continuation is also consistent to BLM's Allowable Uses as identified in Volume III, page 54, bullet 4.
	87	4	2	Change this sentence to read as follows: "Common to Alternatives 2-7 would be the use of at least a minimum of 21,000 acres within the core area of the Biak Training Center for long-term military use.
	87	4	2	See comment above for Volume II, page 26, paragraph 7, sentence 3, globally change "BIAK training center" to read "Biak Training Center" in all documents.
	97	1	2	This BLM management policy is consistent with OMD Special Use Permit Terms and Conditions and Biak Training Center SOP that already prohibits military training activities on the public lands with live (projectile firing) ammunition.
	112	7	1	See comment above for Volume II, page 53, paragraph 7. OMD requests BLM to clarify or reference in this statement the source or location of the "environmental requirements" or the procedures to establish such in the future before OMD can knowingly fully accept this management statement.
	113	2	-	The italicized title to this paragraph should be deleted. The paragraph does not address area "classification type" or "type of training" as suggested by the title.
	113	2	2	This sentence should be moved to the following "Buffer Areas" paragraph and changed to read as follows: "The Training Center boundary shall include a ¼ mile wide buffer inside the boundary when that boundary is in direct contact with or within a ¼ mile proximity to private property. Military training activities will be restricted to light dismounted training activities within this buffer zone and there shall be no discharge of blank ammunition within the buffer zone. This buffer zone however does not preclude vehicle movement to or from the Training Center along OMD-BLM designated roads through the buffer zone for access purpose to the Training Center."
	113	3	-	OMD suggests moving this entire paragraph on "buffer areas" to page 53 and place this paragraph under "Military Uses" under Management Direction Common to all Alternatives.
	118	2	5	Change this sentence to read as follows: "Alternative 3 would provide about 8000 less acres for long-term military training." Delete that portion of the sentence stating that this is "roughly the same boundaries compared to Alternative 1".
	131	7	-	OMD does not concur with or support BLM Alternative 3. OMD considers Alternative 3 as not meeting the purpose and need. See comment above regarding Volume II, page 13. As noted in the BLM's analysis of environmental consequences, Volume II, page 463, rehabilitation efforts will be impaired and the quality of the natural resources will be reduced and negatively impacted to unmanageable levels by Army and BLM standards.
	131	7	-	OMD suggests the addition of a sentence to the end of this paragraph stating: "Public lands located immediately east of the airport but west of the Canal and adjacent to the OMD's Central Oregon Unit and Training Equipment site, which is OMD owned land, would be retained as part of the Biak Training Center".
	138	2	6	Change this sentence to read as follows: "Alternative 4 would decrease the available area for long-term training from Alternative 1, the existing condition, by approximately 3,500 acres."

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Vol.	Page	Para.	Sent.	Comment
II	149	2-4	-	OMD does not concur with or support BLM Alternative 4. OMD considers Alternative 4 as not meeting the purpose and need. See comment above regarding Volume II, page 13. As noted in the BLM's analysis of environmental consequences, Volume II, page 463, rehabilitation efforts will have to be "more intensive" and consequently more prone to failure and the quality of the natural resources will be reduced and negatively impacted to unmanageable levels by Army and BLM standards. Additionally, the BLM states on page 463 that training activities "may be modified" without stating what will be the environmental requirements for this alternative which would require modification of training activities.
	149	3	1	Change this sentence to read as follows: "Military use would be permitted as shown in the Alternative 4 illustration on Map 35, Oregon Military Department Use Areas."
	149	4	-	OMD suggests moving this entire paragraph on buffer areas to page 53 as per comment above regarding Volume II, page 113, paragraph 3. In combining these paragraphs, OMD also suggests deleting the following phrase: " while equipment transport training are not ".
	166	4	-	OMD suggests deleting this entire paragraph per comments above regarding Volume II, page 113, paragraph 3 and page 149, paragraph 4. OMD also suggests that to be consistent between all alternatives, the buffer be retained a 1/4 mile.
	182	1	-	OMD is concerned about the appropriate military uses, local resident/community concerns, and encroachment issues regarding rotation area #1, the Steamboat Rock area. This area is split by Lower Bridge Road and is adjacent to the Deschutes Wild and Scenic River Corridor and Crooked River Ranch. The OMD can identify no immediate training area requirement for this land allocation but is willing to assess the potential for use of this area. OMD's preference is to utilize areas 2 and 3. Areas 2 and 3 better fit within the design and intent of OMD's future training activities noting that OMD used Area 2 during the 2002 brigade training exercise.
	182	1	2	Change this sentence to read as follows: "Three rotational training areas would be designated so that any one rotation training area would be available for training for a specific duration, estimated at three years per area". Also see comment above concerning this paragraph.
	182	2	1	Change this sentence to read as follows: "Military use would be allowed in those areas identified for Alternative 6 as shown on Map 36."
	197	6	2	BLM should be aware and understand that the OMD only has limited resources to provide restoration. OMD's commitment is to range rehabilitation post military training activities.
	199	1	1	Change this sentence to read as follows: "Military use would be allowed in those areas identified for Alternative 7 as shown on Map 36. The core training area under this alternative is approximately 27,934 acres."
	199	2	-	See comment above regarding Volume II, page 182, paragraph 1. OMD's concerns here remain the same as stated above for that section.
	214	Table 2-1	-	Under the heading of "Military" land uses, OMD requests that the BLM separate out the core training area land allocation and percentage from the rotational training area land allocation in this comparison of alternatives. This separation will better serve the public in understanding the land area allocations between the alternatives, especially in regards to Alternatives 6 and 7.
	226	2	-	OMD requests that this discussion of the local area history include information regarding military training use and development in central Oregon during World War II. For example, the military developed or expanded many of the current airport facilities in use by the local communities today. The military built many facilities still in use today, for example the Great Hall at Sunriver. Such facilities owe their origin to historic 20 th century military training activities in central Oregon and such activities provide economic input to the local economy as well as supported national interests during wartime.
	241	4	3	OMD requests that the BLM insert after this sentence, for public clarity and consistency within this plan, a copy of the statement contained in the last sentence on page 356, paragraph 4: "Typically, military activities do not impact old growth juniper trees or snags."

Vol.	Page	Para.	Sent.	Comment
II	251	3	-	OMD requests that the BLM also include information here regarding the fact that the OMD cooperates with BLM management direction regarding control of noxious weeds and that OMD annual funds a noxious weed abatement program in accordance with BLM management goals and direction.
	287	1	-	OMD requests that the BLM also include information here regarding the fact that OMD cooperates with the BLM fire management program, that OMD is required by the existing permit to provide for wildland fire protection for training areas in use during training activities, and that OMD is currently working on an Integrated Wildland Fire Management Program as part of its effort to improve interagency cooperation regarding wildland fire control issues.
	298	-	-	See comment above for Volume II, page 26, paragraph 7, sentence 3, concerning globally replacing "BIAK Training Center" with "Biak Training Center".
	298	3	3	Change this sentence to read as follows: "The current Training Center boundary is displayed as Alternative 1 on Map 35."
	298	5	5	Change this sentence to read as follows: "While use of the Training Center is expected to remain cyclical, the average annual training usage for the Biak Training Center is expected to range around 12,000 man-days per year or on average less than 70 days per year given the current force structure within the Oregon National Guard. Of those 70 days, 15 days or 20 percent of the training days involve activities at developed training sites such as the Brett Hall and the Central Oregon Unit Training and Equipment Site (COUTES) and therefore occur on lands outside of the scope of the resource management plan."
	299	3	-	OMD requests BLM to define and clarify the statement "There are also restrictions on use of vehicles, excavation activity, and uses near private property".
	299	4	-	OMD requests that the BLM also include information here under the heading of "Rehabilitation" that the OMD has both an Integrated Natural Resources Management Plan and Integrated Cultural Resources Management Plan. The OMD is a cooperator in BLM resource management goals and directions. The OMD rehabilitation program has been a long-term program with a continual expenditure of funds over the past 15 years. The OMD's rehabilitation efforts are reviewed by BLM and use BLM prescriptions for vegetation seeding. Under these programs, the OMD is a cooperator in noxious weed control and under the requirements of OMD's land use permit with the BLM, OMD also provides for wildland fire protection of training areas used during training activities.
	316	8	1	Change this sentence to read as follows entering in the use of a colon: "The planning area has existing withdrawals for:"
	319	4	1	OMD request the BLM include the following sentence: "The OMD has an Integrated Natural Resources Management Plan with the goal of protecting and preserving archaeological resources from damage due to military training activities and cooperates with the BLM's cultural resource management goals and direction."
	322	2	3	OMD requests the BLM include the following sentence: "The OMD cooperates with BLM management of these historic roads and has voluntarily within its SOP restricted military traffic on the Horner Road by reducing the numbers and size of military vehicles allowed to use this route for training purposes."

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Vol.	Page	Para.	Sent.	Comment
II	356	2	-	OMD requests that the BLM identifies and includes under the topic of direct effects that BLM actions have direct effect on the allowable area and type of military training activities to occur within that area. This indirectly affects the readiness and safety of soldiers in the performance of their state and national missions. Indirect effects also include changes to existing OMD plans and programs in that new BLM requirements and environmental regulations will require OMD to update and change its existing plans and programs to conform to new BLM guidelines. While the BLM's plan focuses on direct and indirect effects to natural and cultural resources, a key element of NEPA is the determination of "the degree to which the proposed action affects public health and safety" (40 CFR §1508.27(b)(2)). The Oregon National Guard's readiness indirectly affects the public health and safety of the citizens of Oregon. Additionally, the BLM must advise the OMD within this plan of any inconsistencies between the UDRMP and ORNG plans in accordance with 43 CFR §1610.3-1 as well as identify those inconsistencies to the Governor of the State of Oregon in accordance with 43 CFR §1610.3-2(e). Consequently, the OMD considers the BLM's development of the direct and indirect consequences of this plan on military readiness and the subsequent safety of the citizens of Oregon as being deficient.
	356	4	5	Change this sentence to read as follows: "Typically, military activities do not impact old growth juniper trees or snags." Also see comment above for Volume II, page 241, paragraph 4, sentence 3 concerning moving a copy of this statement and inserting it after that sentence 3.
	419	3	-	OMD requests BLM to include a statement that under the "Review Update of the 1995 Federal Wildland Fire Management Policy" that the OMD/ORNG is preparing an Integrated Wildland Fire Management Policy for the purpose of improving interagency coordination and standardization in providing for wildland fire control and suppression. Additionally the OMD is required under its existing land use permit to provide for fire protection of training areas in use during periods of training activities.
	434	7	5	OMD requests the continuation of current BLM management policy in regards to military access to the Wagon Roads ACEC as per comment above for Volume II, page 80, paragraph 2, sentences 3-4. Such a continuation is consistent to BLM's Allowable Uses as identified in Volume III, page 54, bullet 4.
	461	1	3	OMD requests BLM to amend this sentence to include the following statement: "Continuation of long-term use would be subject to periodic review of both the National Guard and BLM's standards and guidelines and review and monitoring of the National Guard's performance in meeting the standards and guides for the purpose of allowing for adjustments to training activities, mitigation programs, and overall State wide training goals and strategy."
	461	Table 4-19	-	See comment above for Volume II, page 214, Table 2-1. OMD requests BLM to separate out total acreage, core training area acreage from rotation area acreage and percentages, specifically for Alternatives 6 and 7, to clarify these points for the public.
	462	-	-	OMD requests BLM to clearly identify inconsistencies between agency plans and activities, define environmental requirements for each alternative and clearly state what modifications to military training activities may be necessary. Refer to comment above on Volume II, page 356, paragraph 2.
	462	6	1	Change this sentence to read as follows: "Alternative 7 is similar to Alternative 6 except that lands south of the BPA power line corridor and west of the North Unit Main Canal and Pronghorn Resort Road are removed/eliminated from the Training Center.
	462	8	4	Change this sentence to read as follows: "With the exception of public lands immediately east of the airport and adjacent to OMD's Central Oregon Unit and Training and Equipment Site (COUTES), the military would probably replace training currently done west of the North Unit Canal to the area north of Highway 126 to avoid conflicts with the Pronghorn Resort development."

Vol.	Page	Para.	Sent.	Comment
II	463	8	3	Change this sentence to read as follows: "BLM and the OMD estimate that training would occur about 5 to 7 days per year in the rotational areas, which would reduce training days on the core training area to an estimated 48 days per year."
	464	1	-	This paragraph can be deleted since it is redundant to information contained within Volume II, page 463, paragraph 8.
	475	5&6	-	OMD requests that the BLM clarify this analysis of alternatives, identifying the environmental requirements and restrictions being placed on military training activities and identifying the inconsistencies between current planning and uses and those being developed under resource management plan in accordance with 43 CFR §1610.3-1(c) and §1610.3-2(e). This is particularly crucial in considering Alternatives 3 and 4. Refer to comments and concerns expressed above for: Volume I, page XXXV, paragraph 5; and Volume II: page 53; page 356, paragraph 2.
	484	3&4	-	<i>Ditto.</i>
	488	2&3	-	<i>Ditto.</i>
	492	4&5	-	<i>Ditto.</i>
	499	5&6	-	<i>Ditto.</i>
	503	7	-	<i>Ditto.</i>
	504	1	-	
	545	3	4	OMD requests the continuation of current BLM management policy in regards to military access to the Wagon Roads ACEC as per comment above for Volume II, page 80, paragraph 2, sentences 3-4 and Volume II, page 434, paragraph 7, sentence 5. Such a continuation is consistent to BLM's Allowable Uses as identified in Volume III, page 54, bullet 4.
	547	4	7	Change this sentence to read as follows: "Designating an adequate public land base for long-term military training provides the OMD opportunity to apply for congressional funding for major infrastructure development and projects to improve the Training Center; with construction and a gradual increase in training activities, the economic benefits are expected to gradually increase above the 2002 level. Natural resource projects, including range rehabilitation work and the development of an Integrated Wildland Fire Management Program, which will improve wildland fire protection, will provide additional economic benefit to the BLM and local community."
	552	5	-	See comment above for Volume II, page 26, paragraph 7, sentence 3: Globally change "BLAK Training Center" to read "Biak Training Center".
	552	5	4-5	Change this sentence to read as follows: "The Biak Training Center cannot qualify for congressional funding of capitol improvement projects unless OMD obtains a long-term land use agreement of at least 30 years. Such improvements and upgrades will qualify the Training Center for a change in the National Guard Bureau's rating of the Training Center from a local training center to an intermediate training center. This change in rating will also enhance the OMD's ability to obtain additional funding for full time manpower and equipment to staff the Training Center."
	588	-	-	OMD recommends that the BLM include here a list of the Cooperating Agencies.
Volume III				
Vol.	Page	Para.	Sent.	Comment
III	20	-	-	OMD concurs with Objective MU-1, the Rationale and Guidelines applicable to Objective MU-1 with one caveat. OMD's representative has repeatedly stated OMD's position to the BLM that OMD cannot adequately assess the land allocation decision of the BLM without also fully knowing the Terms and Conditions of such use. OMD continues to express its opinion and concern that land allocation, the defined length of use, and the Terms and Conditions of use are intrinsically related issues and cannot be adequately assess without full knowledge or consideration of all those factors together. OMD contends that BLM cannot fully and knowledgeably identify inconsistencies between BLM and OMD/National Guard plans and programs as required within 43 CFR §1610.3 without consideration of all three factors together.

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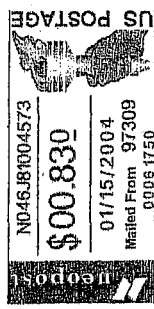
Vol.	Page	Para.	Sent.	Comment
III	20	8	1	See comment above regarding Volume III, page 20.
	36	9	-	OMD concurs with this wildlife guideline to develop a habitat management plan in coordination with the BLM.
	54	1	-	Third Bullet Statement: OMD concurs with this Wagon Road ACEC allowable use noting that the Biak Training Center's Standard Operating Procedure (SOP) already voluntarily restricts vehicle use along the Horner Road by limiting type and number of vehicles allowed. OMD requests that this management direction identified as "common" to all action alternatives be consistently identified and applied in Volume II: page 80, paragraph 2; page 434, paragraph 7; and page 545, paragraph 3. OMD also suggests that the second sentence of this bullet be changed to read as follows: "Locations where tracked vehicles would cross the historic roads will be determined in consultation with the Oregon Military Department."
	64	-	-	OMD concurs with these BLM management objectives, rationale and guidelines.
	77	-	-	OMD requests BLM under Guidelines for OHV Objective R-1 for the Bend/Redmond geographic area to state Guidelines applicable to military OHV use of the Biak Training Center and lands deemed appropriate for military training use. OMD cannot concur with this Objective without knowing the Terms and Conditions being applied to military use.
	77	-	-	OMD concurs with BLM OHV management Objective R-2, the Rationale and Guidelines applicable to Objective R-2.
	84	-	-	OMD requests BLM under Guidelines for OHV Objective R-1 for the Millican Plateau geographic area to state Guidelines applicable to military OHV use of the Biak Training Center and lands deemed appropriate for military training use. OMD cannot concur with this Objective without knowing the Terms and Conditions being applied to military use. See comment above regarding Volume III, page 77.
	96	3	-	OMD concurs with BLM transportation management Objective TU-4. OMD requests BLM to identify consistencies and inconsistencies between this objective and OHV Objective R-1 for the Bend/Redmond and Millican Plateau geographic areas regarding off highway military training uses.
	100	1	-	OMD concurs with BLM public health and safety Objective PHS-1, the Rationale and Guidelines.
	112	6	-	OMD concurs with BLM military use management Objective 2MU-1.
	112	9	-	OMD suggests that BLM move this paragraph regarding "Buffer Areas" to "Management Direction Common to All Alternatives" Volume III, page 20 under the subheading "Military Uses".
	114	8	-	See comment regarding OHV Objectives above under Volume III, page 77.
	117	9	-	<i>Ditto.</i>
	125	1	-	OMD requests that the BLM identify which specific roads within the Training Center will be closed and what if any exemption the ORNG will be given to use such roads for training activities. OMD cannot concur with BLM transportation management Objective 2TU-5 without knowing the Terms and Conditions being applied to military use and without identification of any inconsistencies between BLM and OMD/ORNG plans and programs. Additionally, closure of all roads, to include military traffic, as designated on Map S-2 will have detrimental effects on the ability of the ORNG to effectively use the Biak Training Center for military training activities. This issue is applicable to all BLM transportation management direction for all alternatives. OMD requests BLM consult and reach consensus with OMD prior to the determination of which roads are to be closed within areas designated as appropriate for military training activities.
	139	5	-	OMD does not concur with BLM military use management Objective 3MU-4. OMD considers Alternative 3 as not meeting the purpose and need. See comment above regarding Volume II, page 13, page 131, and page 463.
	141	4	-	OMD does not concur with BLM OHV management Objective 3R-1 for the Bend/Redmond geographic area. See comment above for Volume III, page 77 regarding OHV Objective R-1.

Vol.	Page	Para.	Sent.	Comment
III	145	3	-	OMD does not concur with BLM OHV management Objective 3R-1 for the Millican Plateau geographic area. See comment above for Volume III, page 84 regarding OHV Objective R-1.
	151	9	-	OMD cannot concur with BLM transportation management Objective 3TU-6 without knowing the Terms and Conditions being applied to military use and without identification of any inconsistencies between BLM and OMD/ORNG plans and programs. Additionally, closure of all roads to include military traffic as identified on Map S-3 would have detrimental effects on the ability of the ORNG to train on the Biak Training Center. See comment above under Volume III page 125 regarding road closures.
	158	9	-	OMD does not concur with BLM military use management Objective 4MU-5. OMD considers Alternative 4 as not meeting the purpose and need. See comment above regarding Volume II, page 13, page 149 and page 463.
	163	8	-	OMD does not concur with BLM OHV management Objective 4R-1 for the Millican Plateau geographic area. See comment above for Volume III, page 84 regarding OHV Objective R-1.
	169	5	-	OMD cannot concur with BLM transportation management Objective 4TU-6 without knowing the Terms and Conditions being applied to military use and without identification of any inconsistencies between BLM and OMD/ORNG plans and programs. Additionally, closure of all roads to include military traffic as identified on Map S-4 would have detrimental effects on the ability of the ORNG to train on the Biak Training Center. See comment above under Volume III page 125 regarding road closures.
	177	4	-	See comment above, Volume III, page 112, paragraph 9, regarding "buffers". OMD also suggests that to be consistent between all alternatives, the buffer be retained a ¼ mile.
	179	6	-	OMD does not concur with BLM OHV management Objective 5R-1 for the Bend/Redmond geographic area. See comment above for Volume III, page 77 regarding OHV Objective R-1.
	183	3	-	OMD does not concur with BLM OHV management Objective 5R-1 for the Millican Plateau geographic area. See comment above for Volume III, page 84 regarding OHV Objective R-1.
	187	11	-	OMD cannot concur with BLM transportation management Objective 5TU-6 without knowing the Terms and Conditions being applied to military use and without identification of any inconsistencies between BLM and OMD/ORNG plans and programs. Additionally, closure of all roads to include military traffic as identified on Map S-5 would have detrimental effects on the ability of the ORNG to train on the Biak Training Center. See comment above under Volume III page 125 regarding road closures.
	196	3-5	-	OMD concurs with Military Use Objective 6MU-6 but requests that the BLM clarify its Guidelines. The OMD is not "adopting" lands for purpose of rehabilitation. The Army's rehabilitation program is incidental and applicable only to lands that the military uses for training. Mitigation is a possibility but mitigation work must be clearly defined and correlated to military training actions to offset the environmental consequences of those activities. See comment concerning Steamboat Rock area, Volume II, page 182, paragraph 1.
	198	8	-	OMD does not concur with BLM OHV management Objective 6R-1 for the Bend/Redmond geographic area. See comment above for Volume III, page 77 regarding OHV Objective R-1.
	200	4	-	OMD does not concur with BLM OHV management Objective 6R-1 for the Millican Plateau geographic area. See comment above for Volume III, page 84 regarding OHV Objective R-1.
	203	11	-	OMD cannot concur with BLM transportation management Objective 6TU-6 without knowing the Terms and Conditions being applied to military use and without identification of any inconsistencies between BLM and OMD/ORNG plans and programs. Additionally, closure of all roads to include military traffic as identified on Map S-6 would have detrimental effects on the ability of the ORNG to train on the Biak Training Center. See comment above under Volume III page 125 regarding road closures.

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Vol.	Page	Para.	Sent.	Comment
III	214	5	-	OMD concurs with BLM Military Use Objective 7MU-6 but requests that the BLM clarify its Guidelines, specifically vehicle use of the Steamboat Rock area. This alternative is OMD's preference among all alternatives.
	214	7	-	4 th Bullet regarding Steamboat Rock, closing this area to "full size vehicles" precludes this area from any military training use and effectively closes this area to the military.
	218	3	-	OMD does not concur with BLM OHV management Objective 7R-1 for the Bend/Redmond geographic area. See comment above for Volume III, page 77 regarding OHV Objective R-1.
	224	1	-	OMD does not concur with BLM OHV management Objective 6R-1 for the Millican Plateau geographic area. See comment above for Volume III, page 84 regarding OHV Objective R-1.
	231	9	-	OMD cannot concur with BLM transportation management Objective 7TU-6 without knowing the Terms and Conditions being applied to military use and without identification of any inconsistencies between BLM and OMD/ORNG plans and programs. Additionally, closure of all roads to include military traffic as identified on Map S-7 would have detrimental effects on the ability of the ORNG to train on the Biak Training Center. See comment above under Volume III page 125 regarding road closures.

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January 15, 2004

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BLM PRINEVILLE
DISTRICT

Bureau of Land Management
Prineville District Office
3050 NE 3rd St.
Prineville, OR 97754

RE: Comments on the Draft Upper Deschutes Resource Management Plan and EIS.

Dear BLM:

Thank you for giving us the opportunity to comment on the Draft Upper Deschute Resource Management Plan and Environmental Impact Statement (the RMP). The Northwest Environmental Defense Center's (NEDC's) purpose is to preserve and protect the natural environment in the Pacific Northwest. NEDC monitors federal land management activities to ensure agency compliance with statutes such as the Endangered Species Act, National Environmental Policy Act, National Forest Management Act, the Clean Water Act and others. Our members regularly utilize Bureau of Land Management and other public lands for a variety of purposes and have a strong interest in improving forest and rangeland ecosystems. While the proposed RMP includes some encouraging aspects, in general it potentially threatens these interest.

NEDC maintains that the continuation of livestock grazing and other actions in the planning area at the levels anticipated by the RMP will likely result in further degradation of the areas unique ecological conditions. As a result, these actions are contrary to federal law and the objectives listed in the RMP itself and will significantly and adversely affect the use and enjoyment of the area by NEDC members for the following reasons:

a) The RMP Fails to Satisfy NEPA Requirements.

The RMP does not satisfy NEPA requirements to evaluate a reasonable range of alternatives. While the stated purpose of each alternative appears to be different, the management direction of the various resources in the alternatives differs very little. In each of the alternatives, for example, most of the planning area would be available for mineral sales and the range from 100% to 81% availability varies by less than 20%. *See*, vol. 1, p. 41. In fact, in each of the alternatives, the entire land base is available for locatable mineral entry and the agency does not propose to withdraw any of the planning areas from such use. *Id.*

Similarly, out of the seven alternatives listed, the number of acres that will be grazed by livestock never falls below 230,000. *Id.* at 40. Finally, none of the alternatives contain a "no-logging" proposal and the amount of the land to be logged varies by only 7%. *Id.* at 41.

In addition, the RMP conflicts with NEPA by failing to assess the impacts on the

environment of maintaining existing livestock grazing levels. This is a violation of NEPA which requires federal agencies to determine environmental consequences before taking action. The NEPA process must occur "early enough so that it can serve practically as an important contribution to the decision making process and will not be used to rationalize or justify decisions already made." Reference Guide at § 1502.5 (emphasis added). Even in the event BLM cannot obtain relevant information to make a determination on environmental impacts, it must include a summary of existing credible scientific evidence and its evaluation of foreseeable impacts based on theoretical approaches or if the information is simply unavailable the EIS must indicate this. 40 C.F.R. § 1502.22.

The RMP fails to satisfy the NEPA requirement that it address the environmental consequences of the proposed action by failing to sufficiently discuss the impacts of grazing and other activities on microbiotic crusts which are important in stabilizing soil, fixing nitrogen, increasing soil fertility, increasing growth of higher plants and, in some areas increasing water infiltration. This is in spite of the significant part played by microbiotic crust as indicators of rangeland health and its substantial sensitivity to livestock grazing and other disturbances. The RMP, itself provides that when "biological soil crusts are disturbed, nutrient cycling especially nitrogen, can result in reductions in soil nitrogen or fixation in the range of 75 to 95 percent on sandy soils. This results in changes to species composition, burial, and reduced input and elevated losses (Belnap *et al.*, 2001). They also have direct multi-interactions with vascular plants in cool deserts (frost-heaving) like those in the planning area by 'increased perennial vascular seed entrapment, germination, establishment, survival, biomass, and nutritional status' ((Belnap and Harper, 1995)." *RMP at vol. 2*, p. 286.

b) The RMP Conflicts with the Taylor Grazing Act and the Federal Land Management Planning Act

The RMP fails to provide the BLM's assessment or criteria for its determination of which acres are suitable or which are "chiefly valuable" for livestock grazing in violation of FLPMA and the Taylor Grazing Act. In addition, the agency fails to adequately identify the cause of the degraded rangeland condition of the planning area. Based on the increase of weed cover, the number of water quality limited streams, the decline of native wildlife species, the large number of sensitive species, low native grass and high shrub cover, the rangelands of the planning area are in poor condition. Rather than identify current or even recent livestock grazing and other uses as the cause of these problems, the RMP refers to "past" grazing. *Id.* p. 296. Further the BLM provides that "in the recent past, the public was primarily concerned about the ecological effects of grazing. As grazing management and policy have adapted to address these concerns, the criticism has shifted to the economics of grazing livestock on BLM administered lands." *Id.*

Rather interpreting impacts of overgrazing to miss-conception by the public, however, Interior planning regulations which requires the agency to accurately and fully identify issues in the planning process. *See* 43 C.F.R. 1610.4-1. The RMP is contrary to 43 C.F.R. 1610.4-1 by

failing to adequately identify the cause of the degraded rangeland condition of the planning area. Based on the increase of weed cover, the number of water quality limited streams, the decline of native wildlife species, the large number of sensitive species, low native grass and high shrub cover, the rangelands of the planning area are in poor condition.

In relation to livestock grazing, the RMP provides that under the preferred "alternative the BLM would use a formula to estimate potential for conflict and demand to help identify where problems are likely to occur." RMP vol. 2, p. 199. "The BLM would also set maximum allowable conflict and demand thresholds, and take actions as necessary to keep management costs and conflicts below those thresholds....A model or formula is used in Common to Alternatives 2 -7 to help estimate which allotments have the highest potential for problems, or conflicts...The BLM would then use these estimates to help make decisions about where livestock grazing should continue, and where conflicts might be high enough to warrant modifying or discontinuing grazing now or in the future." *Id* at 84.

The preferred alternative, however, conflicts with "Existing management direction [which] already provides a process for responding to ecological concerns." *Id*. This is based on fact that the "formula for Alternative 7 is modified...by the addition of an "ecological conflict" factor., but this addition would provide decision-makers with a way to consider social, economic, and ecological factors." *Id*. This problem is exacerbated by the fact that, under the preferred alternative, allotments would not be placed in "closed" or RFA status in most cases, unless the grazing permittee voluntarily relinquishes his or her permit." *Id*. at 199.

In addition, inserting an "after-the-fact" approach to decision making into environmental analysis and planning not only violates NEPA but fails to satisfy the planning requirements under FLPMA. The planning regulations require that the "District or Area Manager shall estimate and display the physical, biological, economic, and social effects of implementing each alternative considered in detail." 43 C.F.R. § 1610.4-6. Based on the "wait and see" nature of applying "formulas" to management decisions, however, the RMP cannot provide any definitive determinations in relation to the impacts of livestock grazing and other actions on to the public prior to these actions taking place.

The regulations also require that the "District or Area Manager shall analyze the inventory data and other information available to determine the ability of the resource area to respond to identified issues and opportunities. The analysis of the management situation shall provide, consistent with multiple use principles, the basis for formulating reasonable alternatives, including the types of resources for development or protection. 43 C.F.R. § 1610.4-4. The RMP's "formula" approach, however, could not possibly meet these standard since it does not allow the decision maker to fully and adequately identify the ability of the resource to respond to specific management actions due to its constantly changing nature.

Further, because the formula approach requires well developed and statistically valid

monitoring programs be in place in order to accurately identify the impacts of management decisions, it is highly unlikely, in this case, that decisions necessary to protect resource values will be made during the life of the RMP. This is because, BLM has a long history of failing to conduct required monitoring and to take appropriate action when such studies are done. Further, funds for monitoring have typically been the first items eliminated from BLM's budget and instead of stopping all actions for which the monitoring was supposed to take place, the agency proceeded or continued the actions. *See*, General Accounting Office Report (GAO/RCED-92-51). It is extremely rare for monitoring to be implemented adequately under land management plans. In many cases recovery plans either lack monitoring programs altogether or have extremely vague requirements for how plans should be modified on the basis of data derived from monitoring. *See*, Noss et al, *The Science of Conservation Planning*, Island Press, Washington, D.C. (1997).

c) The RMP is Contrary to the Clean Water Act

The RMP provides that "Currently there are no known BLM actions that are significantly affecting the fisheries resource within the planning area." RMP vol. 2, p. 275. The document also provides, however, that several of the streams within the planning area are currently listed under section 303(d) of the Clean Water Act for failure to meet state water quality standards. RMP vol.2, p. 79.

In addition, the BLM's finding that its activities do not impact fishery resources completely ignores the fact that bull trout which, are found in the planning area, have been listed as threatened due to limitations to: "1) spawning, rearing, foraging, or over-wintering habitat to support existing...local populations; (2) movement corridors necessary for maintaining migratory life history forms; and/or (3) suitable and historically occupied habitat that is essential for recovering existing local populations that have declined, or that is needed to reestablish local populations required for recovery." *Id* at 277. Further, the numbers of redband and brown trout and other fish species are critically low in certain locations in the planning area, in part, due to "poor" habitat conditions and "lack of cover." *Id* at 274.

As a result of the BLM's conclusions regarding the lack of impacts of its management actions on fishery resources, the RMP fails to adequately assess the plans effects on fish habitat and what, if anything, BLM plans to do about the continued degradation of such habitat. The RMP, for example, fails to describe or even identify surface disturbing activities or make anything more than a passing reference to mitigation for such impacts.

d) The RMP Will Likely Contribute to the Need for Listing of Sage Grouse.

"Throughout its range, sage grouse (Bureau Sensitive) is a species of high public interest and may be petitioned for federal listing as either a threatened or endangered species." RMP vol. 2, p. 259. In addition, Sage grouse "relies primarily on sagebrush for its nutritional and habitat needs and is considered an 'obligate species' or 'indicator species' which means their population success can be directly tied to the environmental conditions of the sage-steppe habitat." *Id.*

The quality and quantity of Sage grouse habitat in eastern Oregon including the planning area, however, has declined during the 1980's and 1990's because of prolonged drought, fires and agricultural development. Vast areas that were once sagebrush/bunchgrass habitats are now dominated by cheatgrass with little or no sagebrush overstory making population recovery difficult. J. Connelly, Idaho Department of Fish and Game, Population Ecology and Habitat Needs. Western Sage Grouse Status Conference, Boise, Idaho, (14 January 1999).

Regardless of these issues, under the RMP, Sage grouse is grouped with other wildlife species and vague and limited rules are laid out for their management. Due to the extensive areas and variety of habitats needed to sustain sage grouse, it is unlikely that current/prescribed levels of livestock grazing under the RMP will allow the Sage grouse to recover. Due to the fact that the best nesting and rearing habitat for Sage grouse must consist of grasses and forbs, healthy insect life and untrammeled sage brush cover, unless grazing and other practices under the RMP are drastically revised, these practices will continue to degrade sage grouse habitats and contribute to listing of the species under the Endangered Species Act (ESA).

e) The RMP is Contrary to the Endangered Species Act

Section 7(a)(2) of the ESA requires the BLM to consult with NMFS on activities they authorize, fund or carry out to ensure that such activities are not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of their critical habitat. 16 U.S.C. 1536(a)(2). The BLM's pervasive livestock grazing in the areas, however, will violate this mandate by continuing to degrade necessary habitat for bull trout. In fact, habitat conditions are already stressed for species on the brink of extinction.

f) The RMP conflicts with BLM's IMPLWR

The RMP provides that "[u]nder all alternatives, WSAs and Instant Study Areas would be managed to maintain wilderness suitability consistent with the 1995 "Interim Management Policy for Lands under Wilderness Review" ((B/LP RMP)." RMP vol. 2, p. 52. BLM, however, limits compliance with the IMP to closing all "WSAs and ISAs...to mineral leasing"; regulating Plans of operations; restricting geophysical exploration and management of inholdings that are acquired within a WSA/ISA. *Id.*

The 32,221 acre Badland WSA is a prime example of an area in the planning area needing protection above and beyond that provided in the RMP. Instead, the Badlands and other WSAs should also be off-limits to OHVs; and the few dirt ways that exist there should be allowed to grow over with natural vegetation. Further the public should be encouraged to use non-motorized transportation including walking instead of using OHVs, or skiing instead of snowmobiling. There are ample opportunities for Off-Highway vehicle enthusiasts in the nearby Millican Valley and Fort Rock which is open to OHVs.

In addition, based on the vast amount of acreage allocated to livestock grazing in the planning area under the RMP, it is all the more imperative that WSA's be protected from degradation by livestock and other activities including limiting livestock numbers. The RMP, however, fails to provide any indication that BLM has conducted monitoring or environmental analysis within WSA's. Nor does the Plan indicate that WSAs will be managed for wilderness values by reducing livestock numbers in those study areas where ecological values are declining.

Finally, there are approximately 290 million acres of public land managed by the BLM across the United States and less than one percent of the juniper/grassland ecosystem is protected in any way. The Badlands and other WSAs in the planning area, therefore, provide unique opportunities to restore a native high desert ecosystem in a quickly urbanizing area where the demand for wilderness, recreation and open space is increasing.

g) Noxious Weeds.

The RMP provides that:

Noxious weeds pose a threat to native biological systems and degrade all multiple-uses and other values on BLM administered lands. These plants use water, nutrients, and sunlight that would otherwise be used by native species,

thus altering natural communities and ecosystems. The invasiveness of weeds is due to their genetic make-up, which enables them to exploit a resource "niche," and the lack of natural enemies such as insects, diseases, and pathogens (Story, 1992). Some of the consequences of noxious weeds on BLM administered lands include effects on: productivity of native rangelands; diversity of native plant and animal species; range and population of special status plants; habitat structural diversity; soil biological crusts; scenic values; tourism; recreation; and in some cases, human health and safety. Noxious weeds degrade these uses and values by displacing native plant species, decreasing soil stability, and disrupting natural processes such as soil/water interactions, fire frequency and intensity nutrient cycling and energy flow.

RMP vol. 2, p. 253.

While the RMP, however, indicates that noxious weeds are currently managed under the "Vegetation Treatment on BLM lands in Thirteen Western States and the Prineville District Integrated Weed Management EA...both of which are several years old, *Id.*, the preferred alternative fails to provide for treatment or other means of addressing this critical and pervasive problem. *See*, RMP vol.2, p. 188-197.

II. Requested Action

NEDC specifically requests that the BLM take all actions necessary to address the concerns listed in these comments. In addition, we recommend that the BLM take the following specific actions to the extent they have not been addressed by this document or our comments:

- (a) All rangelands in poor or fair condition should be withdrawn from livestock grazing until they have developed an adequate herbaceous layer and a healthy microbiotic crust. BLM should recognize that microbiotic crusts play a role in a functioning ecosystem, and the monitoring of "biotic crusts" is one of at least 12 indicators that need to be examined as a component of the Watershed Function for Uplands, a Standard for Rangeland Health. The BLM should also recognize that recent literature and a new Technical Reference (TR1730-2), issued in 2001, provide further insight into the impacts on biological crusts from livestock and other factors such as wildfire, the imprints of man, climate events, insects,

rodents and other grazing herbivores. BLM should acknowledge the need to undertake a consistent monitoring approach in evaluating biological soil crusts on upland sites. BLM should agree that the RMP will provide for monitoring for the indicators of rangeland health, including biological soil crusts, and that BLM will use the data resulting from this monitoring to inform decisions regarding management of grazing and other resource uses.

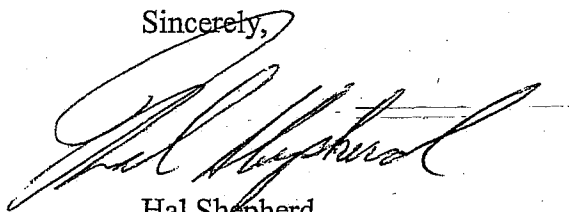
BLM should develop a soil crust monitoring strategy appropriate to the planning area. BLM should provide NEDC and the public an opportunity to review and comment on this methodology prior to implementation, including identification of appropriate reference sites. The monitoring strategy should not be an inventory level but should be a part of the overall evaluation of the watershed function for uplands.

- (c) All rangelands in excellent condition should be permanently withdrawn from livestock grazing to allow baseline conditions to be studied and to act as a genetic reservoir of native species that are necessary for future reintroductions into degraded rangelands of the region.
- (d) All temporary Non-Renewable permits should be permanently withdrawn.
- (e) Rangelands should only be planted with native species.
- (f) Livestock grazing should be reduced unless it can be shown that grazing does not cause or contribute to the spread of invasive weeds.
- (g) Whenever adequate monitoring is not carried out, or evaluation of monitoring cannot take place within a year of data collection, or managers are unwilling to change management direction based on these data, then livestock grazing should be immediately terminated.
- (h) Fires should not be fought in WSA's or special management areas.
- (i) Prescribed burning should occur in the summer when wildfires normally occur.
- (j) Bulldozers and other large equipment that has the ability to disturb the soil and cause new invasions of weeds should be avoided during fire fighting unless property or human lives are at stake.
- (k) Burned areas should be rested from livestock grazing and other activities for at least 10 years following a fire.

- (l) livestock grazing should be allowed only where it has been found to be suitable and the lands chiefly valuable for grazing.
- (m) No grazing should be allowed in special resource management areas.
- (n) True standards having a definite time line should be incorporated.

Please let me know if you have any questions regarding these comments. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Hal Shepherd', with a large, sweeping flourish extending to the right.

Hal Shepherd
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H. Shepherd
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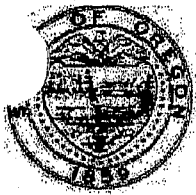
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Bureau of Land Management
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Oregon

Theodore Kulongoski, Governor

Department of Fish and Wildlife

High Desert Region

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JAN 20 2004

BLM PRINEVILLE
DISTRICT

Phone : 541-388-6363

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January 15, 2004

Bureau of Land Management
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Prineville, OR 97754



RE: ODFW Comments on Draft Environmental Impact Statement for the Upper Deschutes Resource Management Plan

OVERVIEW

The Oregon Department of Fish and Wildlife (ODFW) has reviewed the Upper Deschutes Resource Management Plan Draft Environmental Impact Statement (DEIS). The DEIS proposes to revise management on 404,000 acres of Bureau of Land Management (BLM) lands located between Millican, Prineville, Sisters, Bend and La Pine. This area has a rapidly growing population base resulting in user conflicts, impacts to natural resources, public health and safety concerns, wildland urban interface challenges, new plant and animal species listings, resource extraction concerns, protection of archaeological resources, and the need for new or modified transportation and utility corridors. The DEIS goals are to:

- *Sustain and where necessary, practical, and within available funding, restore the health of forests, rangeland, aquatic, and riparian ecosystems.*
- *Provide a predictable, sustained flow of economic benefits within the capabilities of the ecosystems.*
- *Contribute to the recovery and de-listing of threatened and endangered species and 303(d) listed waters.*
- *Provide diverse recreational and educational opportunities within the capabilities of the ecosystems.*
- *Manage natural resources consistent with treaty and trust responsibilities to American Indian Tribes.*

This is an aggressive and progressive resource management plan that addresses historic versus current vegetative conditions, wildlife habitat fragmentation and habitat change, motorized and non motorized recreational activities, livestock management as it is tied to rangeland health, land tenure, public health and safety issues, transportation and utility corridors, along with a number of other issues facing the BLM on 404,000 acres in the upper Deschutes River basin of central Oregon.

The DEIS identifies seven alternatives that include:

- 1) continuation of existing direction
- 2) management of issues on a case-by-case basis
- 3) reducing conflicts between human use and wildlife habitat management objectives
- 4) emphasizing recreational uses
- 5) reducing conflict activities and providing higher wildlife habitat within the urban area
- 6) reducing conflict activities and providing higher wildlife habitat within the rural area
- 7) Preferred Alternative that combines various features of the other six alternatives

ODFW supports the Preferred Alternative (7) with seasonal closure modifications to motorized vehicles on identified primary wildlife emphasis areas in the North Millican, Millican Plateau, and Prineville Reservoir geographic areas to protect wintering big game species. ODFW supports the motor vehicle restrictions and closures in the Badlands, Horse Ridge, and South Millican geographic areas to protect wintering big game and wintering, nesting, brooding, and rearing sage grouse in the South Millican geographic area. ODFW **recommends** these modified seasonal closures due to impacts that Off Highway Vehicle (OHV) activities have on wintering big game

species and sage grouse. Due to cumulative impacts occurring in the North Paulina Unit, ODFW has not met the established management objective of 5500 wintering mule deer since 1981.

ODFW commends the BLM Prineville District staff for their unprecedented effort to engage and obtain meaningful input from a broad cross section of public perspectives. ODFW appreciates the opportunity to fully participate and provide input. Recognizing the difficulty it would take to implement developed strategies, the BLM chose to engage the public up front and throughout the process with the hope that public assistance would be provided during plan implementation and maintenance. To this end, the BLM will reconvene public participants in the spring to review DEIS comments and provide recommended changes to the seven alternatives. ODFW also recognizes Mollie Chaudet, project manager, on her skill and ability to hold this process together, keep it on track and on schedule, and to facilitate the production of the DEIS.

ODFW offers the following comments on the DEIS:

MONITORING

The DEIS does not include a monitoring plan to assess effectiveness of the actions identified under each alternative. ODFW recommends that an effective monitoring plan be included, to assess effectiveness and allow for adaptive management to ensure that objectives are met. For example, Alternatives 2-7 call for some very complex motorized and non-motorized systems of shared use, separate use, limited use, and habitat effectiveness outcomes. A monitoring plan is critical to ensure that habitat effectiveness objectives are met. If objectives are not met, an adaptive management approach will allow actions to be adjusted as needed.

In the event that proposed outcomes are not achieved¹, or adequate staff and funding for plan implementation is not provided², ODFW **recommends** that some sort of plan modification, or a default plan, be identified and described that will provide for natural resource protection.

MILLICAN PLATEAU

Page 133, "Snow depth would be measured at the current designated measurement locations and averaged." ODFW **recommends** that the rationale be provided for selecting specific measurement locations and snow depths. As noted in ODFW's (12-20-99) letter to BLM regarding the Millican OHV judgement (Attachment 1), a positive correlation was established between snow depth at the Hungry Flat Snow Course (vicinity of the Inn of the Seventh Mountain) and overwinter survival of mule deer in this portion of the North Paulina Mule Deer Winter Range for surface mining restrictions. Since 1999, no description of BLM's snow measurement locations or the rationale behind the selected locations and snow depth by time period has been provided.

ECOSYSTEM HEALTH AND DIVERSITY

This section contains an excellent overview of the major vegetative types, important wildlife species, hydrological conditions, geology, and other natural resources along with factors that may affect the sustainability or proper function of these resources over time. This comprehensive information allows readers to better understand how the proposed alternatives may cause changes that affect existing natural resource conditions across the planning area

Two of the major themes, Historic Range (Alternatives 3, 6, & 7) and Current Distribution (Alternative 2, 4, & 5), are perplexing. Conceptually, the themes of restoring vegetative associations, wildlife species distribution and connectivity, hydrological functions, etc., are understandable either within current distribution or within historic range. Yet when the

¹ DEIS Page 478, Travel Management/ Recreation Emphasis Designation – "However, given the amount of acreage identified for designated road and trail systems, it is likely that in the short term, many areas will not undergo specific road and trail planning and will either remain as unmanaged travel networks or have interim systems implemented that do not offer quality recreation experiences due to a lack of quality road/ trail facilities/ alignments or just an overall shortage of road/ trail miles contained in interim systems (which will likely rely heavily on roads versus trails)."

² DEIS Page 326, Implementing the Alternatives – "For the purposes of this analysis, we have assumed that existing resources and personnel would be redistributed to respond to new priorities set by this plan, although the amount of work accomplished annually to meet plan direction would continue to be dependent upon annual budgets and overall BLM priorities."

plan is considered as a whole, much of the proposed DEIS management direction for Alternatives 2-7 could preclude the desired outcomes – such as fuels reduction in the wildland urban interface, open roads and trails to motorized vehicles, exotic and noxious weeds, access Right of Ways (ROW) to private property, and livestock grazing and fencing. To address this dilemma, ODFW **recommends** site specific NEPA planning during plan implementation, to allow a more thorough analysis and evaluation of the desired social values in each geographic area in the context of the area's ecological potential. This approach would optimize desired outcomes under either theme of current distribution or the more expansive theme of historic range.

The following two quotes by noted fire scientists provide some perspective to ODFW's recommendation: According to Agee (1996) *"A note of caution should be injected into the "natural range of variability" paradigm as a model for future management of disturbances like fire. First, the range may be so broad as to be meaningless as a guide for management; almost any fire outcome might be acceptable in this situation. Second, we are not dealing with the ecosystems of historical times. Even "natural" areas are surrounded by severely manipulated landscapes."*³

And Schmidt (1996) *"I would suggest that "restoring" fire, that is to say, going back to the way it was historically, is a fool's errand because it is NOT sustainable. It is not sustainable for three reasons: social demand, economic considerations, and the changing nature of the ecological system itself."*⁴

WILDLIFE

The wildlife information compiled for this planning effort is impressive. Updating wildlife range and distribution maps, creating a criteria base from which to evaluate values and impacts to wildlife, identifying source habitats and priority restoration areas all took an incredible amount of time and dedication to develop and produce the volume of information provided. ODFW recognizes Bill Dean and the BLM staff who assisted him in this effort to produce comprehensive wildlife information while working under shifting alternative strategies and staff time limitations.

WILDLIFE EMPHASIS LEVELS

Page 37 – ODFW supports the concept of creating wildlife emphasis levels. However, under primary wildlife emphasis the plan states that *"Areas allocated to primary emphasis are intended to benefit wildlife and retain high wildlife use by applying one or more of the following guidelines:*

- *Target habitat effectiveness for a geographic area at 70 percent or greater;*
- *Where possible, maintain large, un-fragmented patches (1000 to 2,000 acres);*
- *Target low densities of open motorized travel routes (<1.5 mi/mi²)*
- *Rate as a high priority for habitat restoration treatments."*

ODFW **recommends** that at least the first three and preferably all of the guidelines be applied for primary wildlife emphasis areas. Implementation of the first three guidelines is consistent with the Habitat Effectiveness values provided in the DEIS for each geographic area by Alternative.

ADAPTIVE MANAGEMENT

Page 349, Sage Grouse, last sentence, *"However, Alternative 7 would also take an adaptive management approach at meeting both wildlife and recreational needs in the North Millican geographic area."* It is not clear how the plan will "take an adaptive management approach" if an adaptive management methodology has not been established. ODFW **recommends** that the stated adaptive management approach be clarified, including monitoring criteria that would trigger management changes.

ASSUMPTIONS

Page 351, ninth bullet, *"Standard design features described in Chapter 2 will be applied as described."* Please specify what the described standard design features are in Chapter 2?

³ Agee, James K., 1996, Fire Regimes and Approaches for Determining Fire History. In GTR 341 The Use of Fire in Forest Restoration. June 1996.

⁴ Schmidt, Gordon R. 1996. Can We Restore the Fire Process? What Awaits Us if We Don't? In GTR 341 The Use of Fire in Forest Restoration. June 1996.

HABITAT EFFECTIVENESS (HE) (>70% PRIMARY, >50% SECONDARY, <50% MINOR)

Page 352 – ODFW supports using as a model *The Habitat Effectiveness Index for Elk on Blue Mountain Winter Range*, and incorporating modifications based on findings in Rowland et al. (2000). However, it is difficult to understand how the habitat effectiveness ratings were derived, and whether they adequately assess potential habitat impacts under the proposed alternatives. Without implementing the model consistently and as designed, the HE values will have limited application for comparing loss of habitat effectiveness under each motorized access proposal. ODFW **recommends** that the model be carefully implemented to allow accurate assessment of habitat impacts under each proposal.

ODFW **recommends** modifying the modeling approach described on Page 205 in the North Millican Area that excludes consideration of motorized trails within ¼ mile of roads or ROW. ODFW can support excluding trails in the HE calculations that are part of the ROW. However, trails outside of ROWs should be included as part of the total road mileage used to calculate HE and in reaching motorized density goals for a particular area.

The following DEIS examples provide conflicting information regarding how habitat effectiveness calculations were derived and applied:

- Page 36 under Habitat Effectiveness, *"The approach used in this plan is to identify source habitats by general vegetation types and to display habitat effectiveness by alternative as it relates to the amount of influence of open roads and un-fragmented patch size."* (also see page 37, Primary wildlife emphasis, which contradicts this statement, "apply one or more").
- Page 205 under North Millican, *"The road and trail system densities for the area would be limited to a range of approximately 1.5 miles per square mile. Trails located within existing road or ROW corridors (i.e., parallel to, with ¼ mile or less from existing roads or ROWs) would not be calculated as separate trail or road miles in reaching density goals for the area."*
- Page 349 under Transportation Management Assessment, *"This analysis only considers the allocation of arterial and collector roads and does not give a complete picture of the effects and management implications, especially as it relates to the management of local roads."* See page 577 for a summary of the arterial, collector and local roads.
- Page 349 under Sage Grouse, *"North Millican appears to have the ability to achieve a high (71 percent) habitat effectiveness; however, this area is also identified to provide OHV trails that are not considered in the HE calculations."*
- Page 350 under Mule Deer, *"As in other situations, local roads and OHV designations need to be considered before knowing the significance of any listed HE score."*
- Page 352 under Use of other analysis and/or models, second bullet, *"Also, potential vegetation treatments could complicate the suitability of the habitat in relation to open roads...For the draft EIS, only the roads effects will be modeled."*
- Page 353 under Common effects of some resource management programs, *"Bureau of Land Management resource management programs such as recreation, minerals, lands and forestry often effect the environment in similar ways, such as by removing habitats for site developments and road and trail construction and by causing disturbances in relation to motorized travel access."*
- Page 358, fourth bullet, *"Using the Habitat Effectiveness index for sage grouse, deer and elk based on arterial and collector roads provides an understanding of the different levels of effects associated with the two road options...However, local roads are included in the road influence indexes for source habitats to display the current conditions and provide a comparison to the management guidelines identified for each wildlife emphasis level in each alternative."* (also see page 37, Primary wildlife emphasis which contradicts this statement).
- Page 358, fifth bullet, *"Currently, existing data (vegetation condition) is not available to fully assess the HE, but sufficient data is available to assess the effects of different motorized travel route designations (arterial and collector roads). Local roads are not included in the HE analysis because their specific arrangement does not differ by alternative. However, a discussion of a comparison between the proposed wildlife emphasis levels is made with the HE."*
- Page 366, under Shrub-Steppe Source Habitat, Transportation (with a similar statement page 367 under Juniper Woodland Source Habitat, Transportation), *"The analysis of transportation (motorized travel) effects on shrub-steppe source habitat (and associated wildlife species) includes all mapped roads (arterial, collector and local roads) and motorized OHV trails in the Millican Valley OHV trail system. In some geographic areas this*

calculation underestimates the effects of motorized travel because not all roads and trails are mapped and therefore are not included in the analysis."

- Page 369, under Sage Grouse, Deer and Elk, Transportation, *"In the North Millican geographic area an HE analysis was done for sage grouse, deer and elk habitats using all BLM recognized roads and motorized trails located on BLM administered lands.....Please note that HE is calculated by alternative for arterial and collector roads and the results are presented in each alternative."*

AFFECTED ENVIRONMENT

Page 264, Mule Deer – The description of deer winter ranges includes some inaccuracies and omissions. The North Paulina Winter Range information is inaccurate. The plan states that *"The North Paulina Winter Range includes 3,750 acres of public land in the Bend-Redmond management area. The management objective for this area is to maintain 5,500 deer."* The correct information should read, The North Paulina Winter Range encompasses approximately 200,000 acres with about half-managed by the BLM and the other half managed by the U.S. Forest Service. The North Paulina winter range located in the planning area is primarily within the following geographic areas: Horse Ridge, Badlands, and North Millican (108,126 acres), with the North Millican area identified as the most critical in the Bend La Pine Resource Management Plan (B/LP RMP). ODFW management objective for the North Paulina Winter Range is to maintain 5,500 deer, which is 20 percent higher than ODFW's population estimate of 4,400 wintering mule deer for the past three years. Furthermore, the management objective for the North Paulina Winter Range has not been met since 1981. ODFW believes the following cumulative factors play a large part in this outcome:

- Increased year round recreational motorized activities including OHV use;
- Increased residential development in winter range;
- Increased Hwy 97 traffic that bisects summer and winter range;
- Decreased summer and transition range forage due to a denser forest canopy;
- Managing for homogenous stands of black bark ponderosa pine across large acreage on the winter range. 70+ year old trees tend to be evenly spaced with a raised canopy, which does not provide cover or forage;
- Loss of cover and forage from recent wildfires;
- Fuel and Forest Health treatments that significantly affect maintenance of recommended deer cover forage conditions;
- An older cohort of bitterbrush that may be putting most of it's productive energy into plant maintenance rather than annual leader growth;
- Predation and poaching;
- Significant livestock utilization of bitterbrush annual leader growth on winter range.

Additionally, there is no discussion about the winter range or management objectives associated with either the Maury or Ochoco mule deer winter ranges. ODFW **recommends** including the following information: The West Maury winter range includes all of the Prineville Reservoir Area south of the reservoir and river, and northeastern portions of the North Millican Area. The current B/LP RMP recognizes the area south of Prineville Reservoir as crucial deer winter range. ODFW's most recent population estimate of 4700 deer is below the objective of 5200 deer for the Maury unit. ODFW estimates the West Maury winter range winters approximately 10-15% of the deer in the Maury unit.

The portions of the Prineville Reservoir area along the north side of the reservoir, including ODFW's wildlife management area (WMA) provide winter range for Ochoco unit mule deer. This includes lands jointly managed by BLM, ODFW, Crook County, Oregon State Parks, and the Bureau of Reclamation (BOR) to protect wintering deer.

Pg. 265, Rocky Mountain Elk: Add a description of the north/south travel corridor identified in the eastern end of the Prineville Reservoir area, and illustrated on Plan Map S-10. ODFW believes this travel corridor is utilized primarily during the winter by an estimated 100 - 250 elk moving between the Maury and Ochoco units.

SENSITIVE SPECIES

The DEIS provides an extensive and comprehensive list of wildlife species of concern known to occur, or that could reasonably be expected to occur, in the planning area. ODFW supports the general direction and management guidelines presented in the Plan (pgs. 44-46, Table 2-2), and urges the BLM to follow through with effective implementation and staffing to ensure monitoring occurs. Alternative 7 makes sensitive species habitat a priority for protection and

restoration, which ODFW supports. ODFW believes effective implementation of these guidelines will be especially challenging given the resource demands of the growing population of people in the planning area. Two species of particular concern are bald eagle nesting and roosting on Grizzly Mountain and Prineville Reservoir, and sage grouse using the southeast portion of the planning area.

RECOMMENDED CHANGES TO ALTERNATIVES 2 - 7

Based on the uncertainty of the HE analysis to accurately assess wildlife impacts, the lack of a monitoring plan to assess plan success, or a strategy to provide for protection of natural resources if plan goals and objectives are not met, ODFW **recommends** seasonal closures to motorized OHV use to protect sage grouse and wintering big game resources for all alternatives in the following geographic areas⁵:

Badlands, Millican Plateau, and North Millican – December 1 to April 30 to protect wintering deer, elk and antelope

Horse Ridge, Prineville Reservoir, and Tumalo – December 1 to April 30 to protect wintering deer and elk,

South Millican – December 1 to July 31st to protect wintering antelope and wintering, nesting, brooding, and rearing sage grouse.

ODFW also **recommends** dropping the seasonal OHV closure in the La Pine geographic area for all alternatives.

PUBLIC HEALTH AND SAFETY

ODFW understands the need for certain firearm restrictions and supports the measures in the Preferred Alternative that allow for hunting during all hunting seasons, including year around hunting for species that have no closed season. The Preferred Alternative strives to strike a balance between meeting public safety requirements, while maintaining recreational opportunities for hunting on most land within the planning area. However, the draft plan does not contain language that specifically allows ODFW personnel to use firearms in an official capacity on BLM lands where firearm restrictions are proposed. ODFW **recommends** the Record of Decision include a provision that allows ODFW to utilize firearms for wildlife management purposes on lands where public no-shooting restrictions apply.

LAND OWNERSHIP

Consolidation of parcels as identified in the DEIS (lands along the north side of Prineville Reservoir and adjacent to the WMA) would help maintain habitat effectiveness on adjoining deer winter range. In addition, the three parcels identified on the attached map would provide similar resource benefits and should also be considered for consolidation.

PROPOSED MOTORIZED RECREATION SYSTEMS

ODFW supports limiting OHV use to designated roads and trails for Alternatives 2-7.

ODFW is concerned that the DEIS does not include effective methods for monitoring OHV impacts, and adaptive management strategies to successfully implement the Preferred Alternative. Furthermore, ODFW is concerned that current levels of staff and funding may not be sufficient to implement the Preferred Alternative.

ODFW **recommends** that BLM present a progress report regarding monitoring actions that are specified as a result of the Interim Travel Management court judgement for the Millican Valley OHV area (3-10-2000). The progress report should provide some indication of BLM's effectiveness in monitoring OHV impacts on wildlife habitat, and provide an estimate of the levels of staff and funding required to provide effective monitoring over the entire planning area (see Recreation Summary/Assumptions page 469 DEIS). Furthermore, the summary would provide OHV use information by month and week. This information could help reviewers understand potential impacts that proposed wildlife protection seasonal closures could have on OHV use during the winter months.

⁵ Page 554, Recreation and tourism – “In Central Oregon, tourism and recreation serve as important income generators. For example, the 2001 National report (U.S. Department of Interior, 2002), shows that participants 16 years and older spent \$769 million on wildlife-watching activities in Oregon in 2001, fishermen another \$602 million, and hunters some \$365 million, representing a combined total contribution of about \$1.74 billion to the State's economy. While no precise figures exist for the planning area, it is clear that these activities are important within the regional context.”

This recommendation is consistent with the DEIS proposals to:

- a) implement a major shift in OHV use from open unless designated as closed or limited, to closed unless designated open.
- b) identify wildlife emphasis areas, assuming that OHV impacts can effectively be managed to meet the assigned HE value (70%, 50% or <50%) for each wildlife emphasis area.
- c) reassign current levels of staff and funding to effectively implement these strategies.

Judgement #8 in the Interim Travel Management Plan, March 10, 2000, states, "*BLM shall schedule monitoring of OHV use for each weekend during the months of December through April as well as additional monitoring mid-week in March and April. The data collected shall include user numbers and rate of compliance with trail system rules. Occasional failures to monitor due to unforeseen circumstances (e.g., illness, weather creating safety risks for personnel) shall not constitute a violation of this judgement. This final judgement shall not be interpreted to require the BLM to allocate law enforcement personnel to policing the Millican Valley Area beyond those personnel that the Field Manager, in her discretion, deems necessary for the proper management of public lands. However, the BLM shall seek additional law enforcement funds from the State of Oregon ATV Committee for the purpose of carrying out the restrictions on OHV uses in the areas described by this final judgement.*" The Millican Valley OHV area judgement includes the following DEIS geographic areas: Horse Ridge, South Millican, North Millican, Millican Plateau, and Badlands.

ADJOINING PUBLIC LANDS

ODFW **recommends** the BLM manage their lands consistent with or better than habitat conditions on adjoining public lands to provide for wildlife connectivity and distribution.

ODFW appreciates the opportunity to review the DEIS and provide comments to BLM. Upon request ODFW will provide clarification to our comments or work with BLM staff and other participants to develop solutions to the issues we raise. ODFW presents these comments as a means to refine the DEIS by helping to clarify plan direction and potential outcomes.

Thank you for the opportunity to fully participate in the process.

Sincerely,



Alan R. Dale
High Desert Region Manager
Oregon Department of Fish and Wildlife



Oregon

John Kitzhaber, Governor

Department of Fish and Wildlife

High Desert Region

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Bend, OR 97702

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Attachment 1

December 20, 1999

United States Department of the Interior
Bureau of Land Management
Prineville District Office
PO Box 550
Prineville, OR 97754

ATTN: Shaaron Netherton

RE: Central Oregon Forest Issues Committee v. Kenna, Civil No. 98-29-ST (D. OR)

Thank you for the opportunity to comment on this judgement. I have one specific comment I would like to address. On page 4, item 7 of the final judgement there is reference to snow depths measured at "several locations and averaged" dealing with snow depths at certain times of the year.

This section appears to attempt to duplicate the operating restrictions mandated by Deschutes County for the Howard Day surface mining pit. This section fails in its attempt to duplicate the Howard Day surface mining pit restrictions.

Deschutes County, Howard Day, and ODFW developed the above criteria based on numerous factors. Our review of snowfall depth data showed a positive correlation between it and overwinter survival of mule deer in this portion of the North Paulina Mule Deer Winter Range. This information and yearly trend data was used to develop the snowfall criterion. For surface mining activity to occur, monthly snow depth must be less than 85% of the average snow depth at the Hungary Flat Snow Course (in the vicinity of The Inn at the Seventh Mountain) for the time period used. This is estimated from records for the Bend area watersheds, based on snow depth through the winter. If snow depth for a particular time period is less than 85% of the long-term average, for the same time period, mining operations can take place. This is the lowest elevation snow course usable as an index of snow conditions on winter and transition areas further east. While snowfall on the winter range is a major determinant causing deer to move into these northerly portions of the wintering range, there are times when deer move into the area when snowfall is low. New growth of forage, i.e., grasses & forbs, might draw animals into these areas. Additionally ODFW's population management objective for the North Paulina Unit is 5500 animals. Current deer population levels are 92% of the desired population level. This equates to 5100 deer. There is the potential that as the population rises to the management objective, there will be more demand by animals for this portion of the wintering range. For these reasons ODFW felt it necessary to have a second means to minimize disturbance to animals moving into the area when snowfall is not the driving factor. This "Animal Presence" criteria is based on the average deer per mile observed over a set number of transects or miles.

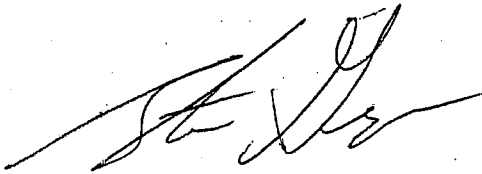
The average deer observed per mile for this criteria are 5.0. In order for these criteria to be effective in protecting wintering mule deer they must be done, at a minimum, of two week intervals for the duration of the winter months (December – April).

The chart on page 4, section 7 represents the snow level at 85 percent of the average for the given time period for the Hungary Flat Snow Course.

If the intent of section 7 on page 4 is to protect wintering mule deer from OHV harassment then I suggest that the snow measurement criteria which I outlined above be used precisely. Snow measurements as currently outlined in the Judgement would likely never be exceeded if measured within the section 6 page 4 description. Additionally deer per mile survey's need to be established with deer per mile criteria that adequately reflect deer use densities for the area described in section 6 page 4.

If I can be of any further assistance please feel free to contact me.

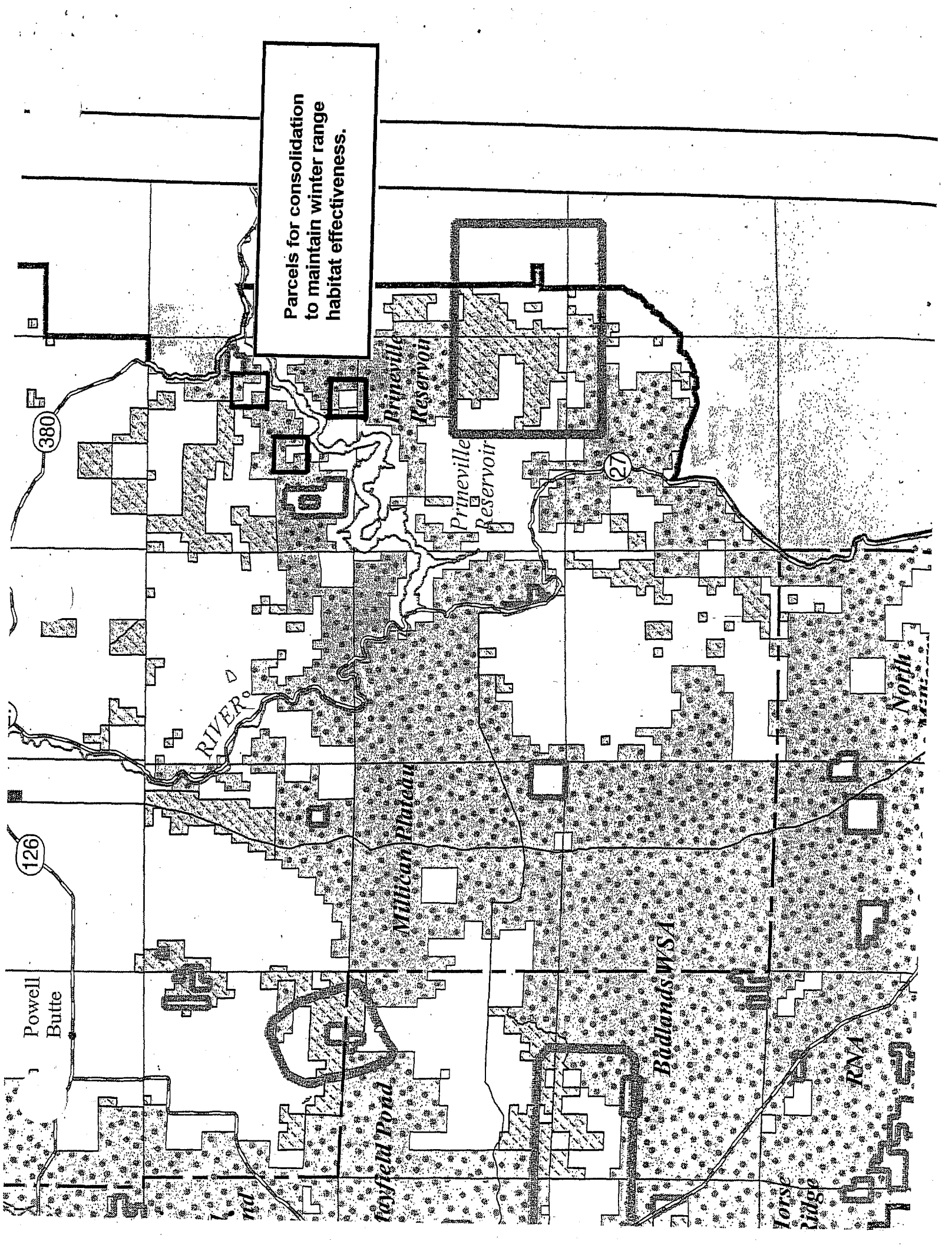
Sincerely,

A handwritten signature in black ink, appearing to read 'Steven George', with a stylized flourish at the end.

Steven George

Deschutes District Wildlife Biologist _____

steven.w.george@state.or.us





Oregon

Theodore R. Kulongoski, Governor

Department of State Lands

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January 15, 2004

RECEIVED

JAN 20 2004

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State Land Board

Theodore R. Kulongoski
Governor

Bill Bradbury
Secretary of State

Randall Edwards
State Treasurer

RE: Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement

Dear Mr. Towne:

Thank you for the opportunity to comment on the draft plan for this area.

In 1995 the Department (then known as the Division) and the Oregon state office of the BLM entered into an agreement (see attachment) concerning the disposition and selection of Oregon's remaining in-lieu lands. As you may know these federal public domain lands are available to Oregon for selection in order to fulfill obligations stemming from the Oregon Admission Act of 1859. Once selected and patented to state ownership in care of the Department, these lands become assets of the Common School Fund to be managed to produce revenue to support K-12 schools in our state.

We note that all the alternatives provide for areas planned for "community expansion." These are lands that the Department considers as prime candidates for future in lieu selections. Therefore we respectfully request the Final Plan acknowledge the State of Oregon's right and interest to select such areas and the Bureau's obligation to assist in processing them to the Department.

If you have any questions about the Department's interests please contact me at 503-378-3805 x 281.

Sincerely,


John Lilly
Assistant Director

cc: Ann Hanus, Director
Steve Purchase, Assistant Director, Field Operations
Nancy Pustis, Field Operations Eastern Region Manager



AUG 8 1994

STATE LANDS

MEMORANDUM OF UNDERSTANDING
BETWEEN
US DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT-OREGON STATE OFFICE
and the
STATE OF OREGON
DIVISION OF STATE LANDS

Purpose

The purpose of this Memorandum of Understanding (MOU) between the Bureau of Land Management (BLM) and the Division of State Lands (DSL) is to establish procedural guidelines to complete all in-lieu or indemnity land selections to which the State of Oregon is entitled.

Authority

1. Revised Statutes 2275 and 2276, 43 USC 851, 852, as amended
2. The Federal Land Policy and Management Act of 1976 (FLPMA), ~~43 USC 1701~~
3. Oregon Constitution, Article VIII, Section 2 through 5

Background

- When Oregon was admitted into the Union, the enabling legislation (Act of February 14, 1859, 11 Stat. 383) granted Sections 16 and 36 of every township to the state for support of its public schools. If any of those lands had already been disposed of or were otherwise unavailable, the US government is required to indemnify the state for the losses pursuant to 43 USC §§ 851 and 852.
- The State of Oregon has currently received approximately 3.5 million acres of school land, including in-place and indemnity selections.
- In the late 1800's and early 1900's, the state sold some of the school sections to private citizens. It was later found that the state did not have title to some of these sections because they were not surveyed or located in national forests.

- ORS 273.620 provided that parcels of land in Sections 16 and 36 which were erroneously conveyed prior to 1916 could be reconveyed to the state by the present successors in interest in exchange for federal lands. ORS 273.620 was repealed on June 19, 1967, and replaced with ORS 273.356 et seq. Under the new statute, a grantee no longer has the right to make a selection of new land, but is entitled to a refund of the original purchase price plus interest.
- Under Section 8 of Chapter 422 [1967] Oregon Laws, the earlier law was modified to provide that grantees who had complied with ORS 273.620 prior to June 19, 1967, would continue to have the right to select lands pursuant to the provisions of the former statute.
- In 1968, the state applied for indemnity land from the BLM on behalf of itself and three applicants known as Ocean View, Baldwin, and Crater Title. The BLM rejected the applications based on its audit which showed that the state had overdrawn its entitlement. Oregon appealed the BLM's finding. In 1991, a final judgment in favor of the state was issued by the US District Court (see Exhibit A) State of Oregon v. BLM-USDI (85-646 MA).
- The court found that the state had a remaining entitlement of 5202.29 acres of school trust land. Subsequently, BLM has clearlisted 798.72 acres to the state. Therefore, the remaining entitlement is now 4,403.57 acres.

Objectives

The objective of this MOU is to facilitate and expedite the completion of all indemnity or in-lieu land selections:

1. Meet the long-range management objectives of both agencies to resolve indemnity/in-lieu selections and issues in accordance with the 1991 court settlement;
2. Develop procedures for conveyance that are most expeditious and cost effective, while remaining within the constraints of existing laws, regulations and land-use plans or amendments; and
3. Convey all remaining indemnity selections to the state no later than April 6, 1996, in accordance with the direction of the Secretary of the Interior.

General Criteria for Indemnity or In-lieu Land Selections by State of Oregon

A. The DSL criteria are:

1. Lands with commercial, industrial, residential, or agricultural development potential within "path of progress" areas such as along the Interstate Highway 5 corridor, Central Oregon or coastal areas.
2. Forest land offering manageability and value comparable to existing common school trust forest lands.
3. Lands identified by DSL on behalf of other parties to which the State of Oregon has an obligation via previous land agreement or similar legally-binding obligation.

B. The BLM criteria are:

1. Only unappropriated public domain lands may be selected. (O&C lands are not considered to be unappropriated public lands and are not selectable.)
2. Lands must be surveyed and described in accordance with the official plat of survey.
3. No lands mineral in character may be selected, except to the extent that the selection is made as indemnity for mineral base lands. BLM will be responsible for making the mineral in character determination for the base and selected lands.
4. Selected lands must be determined to be suitable for transfer to the State of Oregon and classified for disposal under section 7 of the Taylor Grazing Act of June 28, 1934 (43 USC 31f) and the procedures under 43 CFR 2400.
5. Generally, it is preferred that selected lands not be identified for retention in the BLM Resource Management Plans. Retention lands may be selected but final transfer may be contingent upon an amendment to the applicable plan.
6. Selected lands must be reviewed in accordance with NEPA, ESA, etc. and a finding made by BLM that disposal will have no significant impact.

Procedures

To carry out the objectives and follow the criteria for the indemnity or in-lieu land selection program, the following selection are agreed upon:

1. Proposals: The indemnity/in-lieu selections of the DSL will be timely processed by BLM according to the procedures for selection under 43 CFR Part 2621.
2. Mineral Report/Environmental Assessments: BLM will prepare these documents covering the resources on the BLM lands. When the environmental report is completed, DSL will be provided an opportunity to review and comment.
3. Permits/Leases: To the greatest extent possible, in-lieu/indemnity selections should not interfere with valid existing rights. Input from existing lessees or permittees will be obtained jointly by BLM and DSL as soon as possible and critical issues will be considered and resolved as appropriate.
4. Improvements: Improvements on BLM lands may be owned either by a permittee/lessee or the BLM. A record of privately-owned improvements will be provided to DSL if available to BLM. Title to the BLM improvements may be transferred to DSL and a list of these improvements and a copy of the authorization will be provided to DSL.
5. Public Participation: The DSL, as required in 43 CFR 2621.2, will publish a public notice of the proposed selection.
6. Sensitive, Threatened and Endangered Plants and Animals: BLM will coordinate with the US Fish and Wildlife Service on actions which may affect federally-listed species listed in the Endangered Species Act of 1973, as amended. DSL will coordinate with the appropriate state agencies pursuant to compliance with state T&E statutes.
7. Cultural Resources: BLM and DSL will seek to comply with the provisions of the 1982 Memorandum of Understanding regarding cultural resource management responsibilities.
8. Water Rights: All water rights shall be transferred to DSL. Where water uses occur without water rights, application for these rights shall be prepared by the BLM grantor in a form satisfactory to the Oregon Water Resources Department.
9. Base Lands: The final judgment issued by the US District Court in State of Oregon v. BLM-USDI (85-646-MA) concluded that there were 11,947.47 acres of unused base lands and 6,745.47 acres of overdrawn base lands, leaving a balance of 5,202.29 acres of land due to the State of Oregon as indemnity. Attached Exhibit B contains a list of the descriptions of the

11,947.47 acres of unused base lands). The Court did not provide any direction as to which particular unused base lands could be selected or which unused base lands would be used to offset the overdrawn base lands. Therefore, BLM and DSL agree that DSL may use any of the unused 11,947.47 acres as base lands to make its remaining selections. After all the selections are made, the remaining unused base lands will be used to offset the overdrawn base lands.

BLM and DSL will evaluate the value of the base lands and selected lands and determine that they are of "roughly equivalent value" as provided in the US Supreme Court decision in Andrus v. Utah, 446 US 500 (No. 78-1522, May 19, 1980).

DSL may elect to "pool" all or portions of its unused base lands of a sufficient total value to select less acreage of public lands of a higher value, provided the total values of base lands and selected lands are determined to be of "roughly equivalent value." In other words, the remaining selections may be made on an equal value basis, rather than an equal acreage basis. Each clearlist issued will contain a value certification by BLM for both the base and selected lands.

10. The DSL shall attempt to complete all remaining indemnity selections as soon as is practical. The BLM shall attempt to complete all actions on these selections, including the conveyance of approved land selections in a timely and efficient manner.

Coordination

Formal and informal meetings between the designees of the DSL and BLM to exchange information, coordinate activities, develop procedures, expedite tasks, and facilitate achieving the purpose and objective of the MOU shall be held monthly with additional meetings scheduled as necessary or desirable.

Effective Date, Termination, Amendment

This MOU shall be effective upon approval by both parties and shall remain in effect until termination by mutual agreement or by either party upon thirty (30) days notice in writing to the other.

Amendments and supplements to this MOU are subject to the review and approval of the Director, Division of State Lands, and the State Director, Bureau of Land Management.

This MOU is subject to the laws of the State of Oregon, the laws of the United States, and the delegated authority assigned in each instance. Nothing in this MOU shall be construed as obligating either party, heretofore, the expenditure of funds or for future payment of money in excess of appropriations authorized by law.

Approved:

Elaine Zielinski
Elaine Zielinski
Oregon State Director
Bureau of Land Management
US Department to the Interior

7/26/95
Date

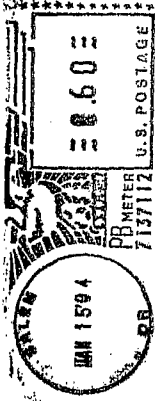
John E. Lilly
John E. Lilly
Acting Director
Oregon Division of State Lands

7/26/95
Date

Attachments

regon Department of State Lands
775 Summer St NE Suite 100
Salem, OR 97301-1279

ADDRESS SERVICE REQUESTED



ncd04
Robert Towne, Deschutes Area Field Manager
Prineville District
USDI-Bureau of Land Management
3050 NE 3rd Street
Prineville OR 97754

#1372

#1373

14 January 2004

Robert Towne
Bureau of Land Management
3050 NE Third Street
Prineville, OR 97754

RECEIVED

JAN 20 2004

BLM PRINEVILLE
DISTRICT

Dear Mr. Towne:

The following are my comments on the Draft Upper Deschutes Resource Management Plan (UDRMP) and Environmental Impact Statement (EIS).

General Comments

The format of this document is in conflict with historical and reasonable precedent. By placing the Alternatives chapter prior to the Affected Environment chapter, the reader is being told the options for managing the area before they are told the existing situation. This approach defies common sense. In literally every environmental document (EIS, EA, etc) produced since the passage of NEPA, the Affected Environment chapter precedes the Alternative chapter. This was not an accident, it was done because it logically should be done that way. It is my suspicion that the response to this comment (if any) will be that the Issues section of Chapter 1 has been substantially expanded when compared to other EIS's. It is true, the Issues section has been expanded. However, it could be persuasively argued that the majority of the 15 page Issues section is a vague summary discussion of the Affected Environment.

An integral part of an EIS is an adequate description of the Affected Environment which gives the reader a "baseline" upon which to judge the environmental impacts of the various alternatives. In my opinion, the Affected Environment section of the UDRMP/EIS is not adequate and may not be in conformance with the National Environmental Policy Act (NEPA). The major inadequacy is that the rangeland condition (health) of the vast majority of the planning area is not presented. A more detailed discussion of this topic is included in the Specific Comments section of this letter.

Several places in the UDRMP/EIS, there is reference to the Interior Columbia Ecosystem Management Plan (ICBEMP) publications. The final decision for ICBEMP was not issued, therefore, it is not appropriate to include anything that would have resulted if the final decision had been issued.

Glossary- a definition of "road" should be included- suggest definition similar to what was used in Lakeview RMP

Specific Comments

page 4- the document refers to ICBEMP documents for ecological integrity. These integrity ratings were developed examining aerial photos i.e. no "on the ground" data was collected and previously collected agency data was ignored. In other words, ICBEMP created a totally subjective, non peer reviewed method, then applied the method sitting behind a desk in Walla Walla. ICBEMP's so called science was tested in the recently completed Lakeveiw RMP/EIS. ICBEMP had rated the vast majority (over 85%) of the Lakeveiw RMP/EIS area as having low rangeland integrity. According to the Lakeveiw RMP/EIS, less than 40% of the area had low rangeland integrity. Thus, ICBEMP was WRONG nearly half of the time, when their conclusions were compared to Lakeveiw's data and knowledge. Based on these facts, it is appropriate to call ICBEMP's methods and conclusions "junk science". In summary, all references to specific ICBEMP integrity ratings (low, moderate, high) should be removed from the UDRMP/EIS.

page 235- The document states: "This section describes the broad vegetative types within the planning area, including important features and trends of each". However, under several specific plant communities headings (Big Sagebrush, Low Sagebrush, Western Juniper, Riparian-Wetland), there is little (if any) discussion of vegetative trends. What is the trend in these communities?

page 278,279 Discussion of Riparian-Wetland Initiative for the 1990's

It should be clarified how (or if) this Initiative relates to the Standards and Guidelines (S&G's) adopted in 1997, e.g. is PFC, functional at risk, and non functional as defined on page 278, or are somewhat different criteria used in the S&G's? Or has the entire Initiative been superseded by the S&G's?

page 294 Allotment Categorization and Appendix G

Reviving a version of the previous M I C categories raises several questions, many of the same questions which were raised (and never satisfactorily answered) 20 years ago. Questions such as:

(1) Do all of the criteria have equal weight? The answer is almost certainly no, although it would be a totally subjective exercise to assign a "weight" to each criteria and in reality, a criteria's weight sometimes could vary by allotment.

(2) Criteria C6- Does "Present Management" mean " present domestic livestock grazing management"? If it does , it should be so stated. If not, "Management" should be defined.

(3) There is almost certainly "double counting" among some of the criteria. For example: (a) the "busy roads" (C4) is in the vast majority of cases associated with "Recreation conflicts" (C3). (b) "adjacent land use" (C4) is very similar to "other uses" (C3) (c) If an allotment was determined to be an "I" for C1, it would also be an "I" for C6 and (d) conversely, if an allotment were determined to be a "M" for C1, it would also be a "M" for C6

As stated on page 295- rangeland health assessments have been completed on about ten allotments". So, there have been no rangeland health assessments on approximately 115 allotments (figures from Appendix G). Therefore, the "M" category (in over 100 allotments) for criteria C1 means "unknown" because the health assessment has not been completed. If, and when, the assessments are completed, it is a reasonable assumption that at least some of the allotments will fall into the "I" category for criteria C1.

To summarize, putting aside the previously identified problems with the entire categorization process, it my opinion that the "Total" management category should not be stated (at least for I's and M's) until the "health assessment" has been completed for a particular allotment. To accomplish this, suggest making a separate table showing only the Rangeland Health assessment progress for each allotment.

page 334- Incomplete or Unavailable Information- Vegetation

As Chapter 1 and Chapter 3 are presently written, the current health (condition and trend) of the vegetation resource is not stated for the majority of the UDRMP area. This fact should be included as incomplete or unavailable information. However, there are several other sources of information which were not included in the document on an allotment specific basis. Some of these sources are: allotment evaluation results of the late 1980's and early 1990's, Soil Vegetation Inventory results, trend plots, and photo stations. Inclusion of these sources would give the reader at least some indication of vegetation health.

page 345- The document states: "An accurate estimate of the amount of roads and trails under each alternative is unavailable at this time". First, "accurate estimate" is an excellent example of an oxymoron (combining contradictory terms or ideas). It is impossible to believe that an estimate of the amount of roads and trails is not available, at least for Alternative 1. Of course, that estimate would not be absolutely accurate, because if it were, it would not be an estimate!!

page 409- Incomplete or Unavailable Information -Riparian

Table 3-8 (page280) shows that Riparian Condition Assessment ratings have been completed on 19 areas. Therefore, there is incomplete or unavailable information on the hundreds of other riparian areas in the planning area.

Sincerely,



Sid Houpt

103 Park West Drive
Pullman, WA 99163

L. Mays
103 Park West Drive
Pullman, WA 99163

RETURN RECEIPT
REQUESTED

CERTIFIED MAIL

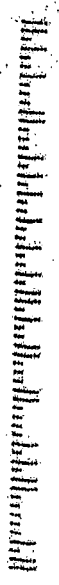


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#1373

Bureau of Land Management
attn: Robert Levine
3050 NE Third Street
Prineville, Oregon
97754

97754#2300



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"Jon & Elaine Austin "
<austinstwo@bendcable .com
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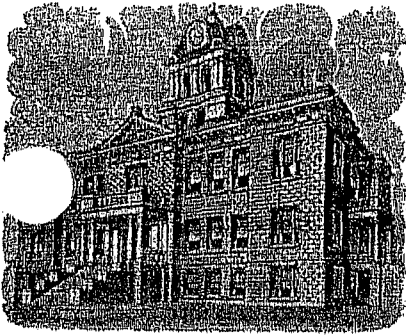
To <Upper_Deschutes_RMP@or.blm.gov>

cc

bcc

Subject

We support closing the proposed Badlands Wilderness to OHV use. Jon and Elaine Austin, Bend



Crook County

#1375

dup of 1307
+ 1362

300 N.E. 3rd Street • Prineville, Oregon 97754

Phone (541) 447-6555 • FAX (541) 416-3891

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JAN 20 2004

BLM PRINEVILLE
DISTRICT

January 15, 2004

U.S. Bureau of Land Management
Prineville District Office
ATTN: Teal Purrington
3050 NE Third St.
Prineville, OR 97754

Dear Ms. Purrington,

The Crook County Natural Resources Planning Committee—a broadly representative group of agency personnel, business, community, agricultural interests, timber and environment/conservation interests appointed by and serving at the pleasure of the Crook County Court—has prepared the attached comments regarding the BLM Upper Deschutes Basin Resource Management Plan. By consensus, the group has adopted these comments. It is my pleasure to forward these additional comments to you to supplement the comments previously filed by Crook County.

Sincerely,

Scott R. Cooper
Crook County Judge

Cc: Crook County Commissioners
Ms. Lynn Anglund, Crook County Natural Resources Planning Committee
Mr. Mike Lunn, Crook County Natural Resources Planning Committee
Baron Bail, Robert Towne, Molly Chaudet, Prineville District BLM

CROOK COUNTY, OREGON NATURAL RESOURCES PLANNING COMMITTEE

Comments on Draft Environmental Impact Statement Upper Deschutes Resource Management Plan

January 15, 2004

Background - The Crook County Natural Resources Planning Committee (CCNRPC) was established by County Order 2002-72 on September 4, 2002. Its 25 members represent a diverse cross-section of the citizens of Crook County. Membership includes foresters, silviculturists, wildlife and fisheries biologists, agriculture scientists, range conservationists, large and small business people, farmers and ranchers, environmentalists and citizens-at-large. A key purpose is the cooperation and collaboration with federal agencies in order to further considerations of important issues of Crook County Customs, Culture and Economy. Our comments are provided in that spirit.

Public Participation - We commend the BLM for the extensive efforts they have made to involve citizens through its various Issue Teams, RAC's, etc. This has clearly been beyond the normal approach, and beyond the minimal requirements of law and regulation. In some respects, the public involvement early on was found by participants to be cumbersome and complicated, at least through the development of Issues. One suggestion we would offer is to work closely with Dr. Laura Van Riper, of the National Riparian Service Team, on a system of follow-up interviews from those who closely participated and others. It will be important to document "lessons learned" and ways to continue the strong efforts at involving the public while also reducing some of the more burdensome and time consuming parts of the process. This information should be shared with the Ochoco NF, which is soon to begin its own LMP Amendment processes.

Range - Given the importance of livestock operations in Crook County, we have specific concerns with some of the proposals. This month, proposed regulations were released for administration of grazing permits, and while they will not be final for several months, the UDRMP FEIS is even further out into the future. Our assumption is that development of those regulations will be closely followed during the continuing work on the FEIS to insure the FEIS and regulations are compatible.

The matrix in the DEIS that includes the range health analysis, grazing demand, and conflict with other use information seems to have been a good analysis tool for this planning effort, but should not automatically be considered adequate where different conditions of resources and grazing activities occur. In UDRMP area, there are many small allotments that might lend themselves to voluntary closure. In areas dominated by larger allotments, such as contiguous resource areas, voluntary closures would be the exception. We also note that closures may be affected by the changing regulations.

We question whether mandatory or voluntary closures are in keeping with the proposed regulations, and the 10th Circuit Court of Appeals decision in *Public Lands Council v. Babbitt*, 929 F.Supp. The mandatory closures due to conflicts with other uses should be carefully considered, and all attempts made to provide for the forage needs of the dependent operators. It seems clear under current direction that suitable grazing land should be offered according to priority to qualified applicants. Uses such as "reserve forage allotments" will not be permitted under the revised regulations. For some areas, such as near La Pine, there is little or no demand for grazing areas due to lack of water and marginal economic conditions associated with grazing. While we understand some environmental groups seek to buy permits to retire them, this is specifically prohibited under the proposed regulations in keeping with *Public Lands Council v. Babbitt*, op cit.

OHV – We believe that recreational use of OHV is a growing and legitimate use of many, but certainly not all areas of our public lands. In general, we support the direction contained in alternative 7, which attempted to work out resource conflicts with OHV uses by separating uses and designating motorized trail systems and specific areas where OHV recreation can occur. At the same time, we find that OHV use potentially can be one of the most destructive uses of public lands if it is not carefully controlled and managed. Unfortunately, many of the commercial advertisements for OHV's are irresponsible, depicting SUV's, 4-wheelers and other vehicles traversing streams, wetlands, mountain terrain and other sensitive environments simply as a challenging activity, and ignoring the potential effects on plants and animals. This carries over to many in the user community.

We recognize that many riders/drivers are responsible, and avoid sensitive areas and follow the rules. We also know that many of the organized groups and associations promote responsible behavior, and work with the agencies to provide enjoyable outdoor experience and protect the environment. And we also believe that OHV use is an activity that has grown rapidly in the past few years, and is largely uncontrolled across the public lands and National Forests in central Oregon. Given the dual potential for a) providing some outstanding recreational activities and b) damaging lands and disrupting populations of plants and animals, a most important focus of this plan needs to be on clear management direction and well-implemented and enforceable management tools.

We have little reason to believe the BLM has the financial or staffing ability to implement the major changes envisioned by Alternative 7. It calls for reducing or eliminating use in some areas and constructing extensive networks of new and loop trails in other areas. On its face, this sounds good, but what assurances exist that the trail and area closures can be enforced or regulated? The DEIS contains no clear monitoring plan describing how it will be determined how well natural resource and OHV objectives are being met, or what happens if they are not achieved. Without the reduction in use that is called for in some areas, the problems will simply be expanded by opening or improving other areas, which has been the history of the Millican OHV area. We recommend that a Cooperative Agreement, with funding by BLM, be developed with the Crook County Sheriff to fund additional patrols, including OHV patrols in key areas to increase enforcement. This is particularly needed to reduce violations of State law, such as

littering, vehicle operation and registration, and wildlife harassment (this has been reported to ODFW/OSP/BLM).

Further, we would urge that the closures and other regulation changes be implemented and monitored before extensive investment in new development. Citizen/user groups should be involved in monitoring to bring transparency to the decision-making process.

Last, we noted that the definition of "non-motorized recreation emphasis" on page 33 is poorly worded and not understandable.

Social and Economic – The DEIS is deficient in identifying the costs and benefits of the various alternatives as they apply to Crook County. While there is some information about the different socio/economic conditions applicable to Deschutes County and Crook County, there seems to be little explanation about how those Counties are affected by the separate alternatives. Crook County has shown recent growth along with our neighbors, but our values remain largely rural and agrarian. Protection of open spaces, local businesses, and family are important, and separate us from our rapidly growing neighbors. We will never have the kinds of recreation developments as those year-round large scale opportunities near Bend, such as ski areas and other winter sports developments, mountaineering, etc. Prineville Reservoir is our major destination recreation area, and we have supported certain continued development in that area. But by and large, the citizens of Crook County and other users tend towards more undeveloped uses including fishing, hunting, and firewood gathering, hiking, driving for pleasure and OHV use.

Unemployment in Crook County is among the highest in the State, and it would be helpful to show how the various alternatives contribute to the creation of jobs, particularly in the contracting area.

Management of Invasive Junipers – We support the juniper control work proposed in Alternative 7, but prefer to see management of old-growth juniper on the basis of stands and not individual trees. For example, in treating invasive juniper to restore suitable habitat for sage grouse, we recommend removal of all trees in the treated area to reduce perch trees for predatory birds. Leaving trees of "old-growth form" in those areas reduces the effectiveness of the restored habitat.

There are many areas where treatment of juniper for restoration, firewood harvest, or any other purpose will be economically and/or physically impractical. Those are largely the isolated patches or rim rock type habitats where older juniper frequently occurs, and management for old stands is logical in those areas. Given the extensive acreages of invasive juniper in Crook County, priority areas chosen for restoration should be treated to minimize juniper stems of all sizes and age classes.

Millican Road – While this road decision was removed from the EIS process by legislative direction, the BLM needs to be aware and plan for the changes in use that will develop once the reconstruction and paving is completed. Granted, there will be

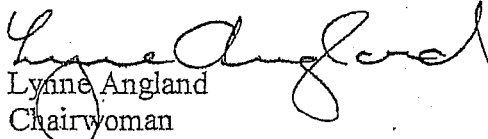
extensive truck traffic on the route, but increasing numbers of recreationists of all kind will likely use the more easily accessible area for hunting, rock-hounding, hiking, biking, OHV, etc. This could increase conflicts with wintering game populations and special species such as sage grouse. Impacts and changing management conditions from this improved transportation facility does not seem adequately considered in the DEIS.

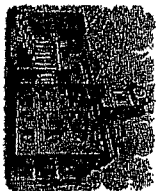
Firearm Use – We support the EIS direction to reduce indiscriminate shooting in areas close to population development. Another step that might be taken would be the creation of a local rifle/shotgun range close to Prineville through special use permit or concessionaire. The Redmond Gun Club is relatively close and available, but having a local range might reduce some of the dispersed plinking, and increase safety of public lands users.

Garbage Dumping – Dumping of garbage is a perennial problem on public lands, and part of our concern about inadequate levels of funding and staffing for enforcement. Several considerations should be made to reduce this abuse. Cooperative funding for the Crook County Sheriff to increase patrol density would help, since garbage dumping is a violation of both federal and state laws. The County has indicated a willingness to set up a “free dump” day at the County landfill in conjunction with organized clean-up efforts for the public lands. There is opportunity to use inmates from the local youth correctional facility for clean-up under agreement with the BLM to extend the clean-up efforts. Educational efforts to make people aware of the extent of dumping should be undertaken. Partnerships with local companies should be undertaken to remove larger metal dumps, such as refrigerators, old cars, etc. Once cleaned, efforts should be made to restrict access to the more heavily abused areas. In some cases such as the Crooked River corridor, volunteer groups could pick up and consolidate trash to be removed by helicopters during fire crew training. We recommend increased emphasis and direction for protecting our public lands from this obnoxious type of violation.

Transportation System Planning – The planning area is heavily roaded by all levels of routes, ranging from collector systems to user created “ways.” This extensive road system reduces the effectiveness of wildlife management attempts, and we encourage the BLM to consider seasonal and area closures and other techniques to reduce the conflicts with wildlife. Achieving the desired habitat effectiveness of 70% on many key areas will be difficult or impossible without further access restrictions.

Thank you for the opportunity to comment on the Upper Deschutes Resource Management Plan DEIS. Our committee remains very interested in the outcomes of this plan and potential effects on customs, culture and economy of our County. We hope to be further involved as the work proceeds toward a final EIS and decision, and would offer to help convene and/or work directly with other affected interests in considering responses to substantive comments and resolving issues.

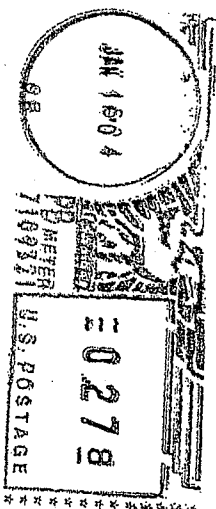

Lynne Angland
Chairwoman



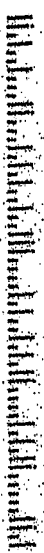
Crook County
300 N.E. 3rd Street
Pineville, Oregon 97754

Bureau of Land Management
Molly Chaudet
3050 NE Third Street
PO Box 550
Pineville, OR 97754

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FIRST CLASS



LAERTS 37754



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JAN 21 2004

U.S. Dept. of Interior
Bureau of Land Management
3050 NE Third Street
Prineville, OR 97754

BLM PRINEVILLE
DISTRICT

Attn: Teal Purrington
Re: Upper Deschutes Resource Management Plan

We own property along the Middle Deschutes adjacent to a parcel of BLM land in the vicinity of Odin Falls. Mr. Parker Johnstone, an adjacent neighbor of ours and I met with Mr. Greg Currie of your office to relay our knowledge of the present use of the BLM lands in our area and the problems we have as a result of that use.

The BLM land referred to is a dumping ground for trash and debris, a party area for the use of drugs and alcohol, shooting in an area that is posted "No Shooting", illegal hunting, trespass onto private property, destruction of private property, and overnight camping, to mention a few of the problems.

We strongly support the designation of the BLM area adjacent to us as no motorized vehicles, the fencing and blocking of obvious access locations for vehicles, no hunting and shooting, no camping and day use only.

As relayed to Mr. Currie, we have the equipment and materials to assist BLM in completing some of the work necessary to help deter the violations of the designations for the BLM property which we support.

We are always available for consultation with your staff as desired.

Yours truly,

Susan & Gary McCabe
5110 NW 83rd Street
Redmond, OR 97756
541/504-0039 420-1250

cc: Elaine Marquis Brong, State Director
Oregon/Washington BLM
333 SW 1st Avenue
Portland, OR 97201

Barron Bail, District Manager ✓
Prineville District BLM
3050 NE Third St.
Prineville, OR 97754

(X)	ACTION INFO	(✓)
	DIV.	
	ASSOC. DM	
	DISTRICT RANGER	
	FIELD SERVICES	
	FIRE & AVIATION	
	CENTRAL OREGON	
	DESCHUTES	

Comment Form

For public input on the Draft Upper Deschutes Resource Management Plan and Environmental Impact Statement

Today's Date: 1/14/04

Your name (please print): GARY L. MCCABE

Representing (put an X in one box only):

☒ self only, or

☐ business, organization, or agency (list): _____

Street Address, State, and ZIP: 5110 N.W. 83rd ST. (P.O. Box 1743) Redmond, Or. 97756

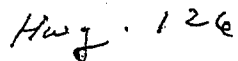
Phone: (541) 5040039 E-mail: earthriver@comcast.com

Important Privacy Notice: All written comments, including names and street addresses, will be available for public review upon request, and may be published by the BLM during the planning process. However, as an individual you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐.

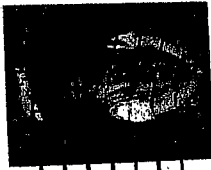
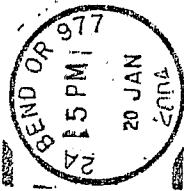
Comments: Please see the attached letter.

Continue your comments on the back of this page, or on additional pages

Cancelled Numbers: 100, 400, 700, 705, 706, 707, 1004, 1100, 1200, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1438, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1574, 1575, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 1595, 1596, 1597, 1598, 1599, 1600, 1601, 1602, 1603, 1604, 1605, 1606, 1607, 1608, 1609, 1610, 1611, 1612, 1613, 1614, 1615, 1616, 1617, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1642, 1643, 1644, 1645, 1646, 1647, 1648, 1649, 1650, 1651, 1652, 1653, 1654, 1655, 1656, 1657, 1658, 1659, 1660, 1661, 1662, 1663, 1664, 1665, 1666, 1667, 1668, 1669, 1670, 1671, 1672, 1673, 1674, 1675, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1685, 1686, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1717, 1718, 1719, 1720, 1721, 1722, 1723, 1724, 1725, 1726, 1727, 1728, 1729, 1730, 1731, 1732, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1743, 1744, 1745, 1746, 1747, 1748, 1749, 1750, 1751, 1752, 1753, 1754, 1755, 1756, 1757, 1758, 1759, 1760, 1761, 1762, 1763, 1764, 1765, 1766, 1767, 1768, 1769, 1770, 1771, 1772, 1773, 1774, 1775, 1776, 1777, 1778, 1779, 1780, 1781, 1782, 1783, 1784, 1785, 1786, 1787, 1788, 1789, 1790, 1791, 1792, 1793, 1794, 1795, 1796, 1797, 1798, 1799, 1800, 1801, 1802, 1803, 1804, 1805, 1806, 1807, 1808, 1809, 1810, 1811, 1812, 1813, 1814, 1815, 1816, 1817, 1818, 1819, 1820, 1821, 1822, 1823, 1824, 1825, 1826, 1827, 1828, 1829, 1830, 1831, 1832, 1833, 1834, 1835, 1836, 1837, 1838, 1839, 1840, 1841, 1842, 1843, 1844, 1845, 1846, 1847, 1848, 1849, 1850, 1851, 1852, 1853, 1854, 1855, 1856, 1857, 1858, 1859, 1860, 1861, 1862, 1863, 1864, 1865, 1866, 1867, 1868, 1869, 1870, 1871, 1872, 1873, 1874, 1875, 1876, 1877, 1878, 1879, 1880, 1881, 1882, 1883, 1884, 1885, 1886, 1887, 1888, 1889, 1890, 1891, 1892, 1893, 1894, 1895, 1896, 1897, 1898, 1899, 1900, 1901, 1902, 1903, 1904, 1905, 1906, 1907, 1908, 1909, 1910, 1911, 1912, 1913, 1914, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1928, 1929, 1930, 1931, 1932, 1933, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 1943, 1944, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1952, 1953, 1954, 1955, 1956, 1957, 1958, 1959, 1960, 1961, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1970, 1971, 1972, 1973, 1974



Susie & Gary McCabe
P.O. Box 1743
Redmond, OR 97756

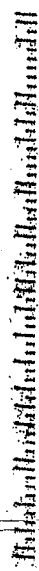


MARY CASSELL USA37

#1376

Robert Towne, Resource Area Manager
Deschutes Resource Area
Prineville District BLM
3050 NE Third Street
Prineville, OR 97754

97754X2999 R00223



1377

RECEIVED

JAN 22 2004

BLM PRINEVILLE
DISTRICT

Bureau of Land Management
ATT: Teal Purrington
3050 NE 3rd St.
Prineville, Oregon 97754

RE: Upper Deschutes Resource Management Draft

As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon.

The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed.

The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

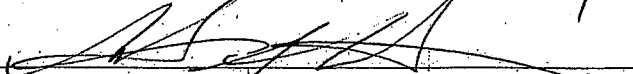
We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents.

Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land.

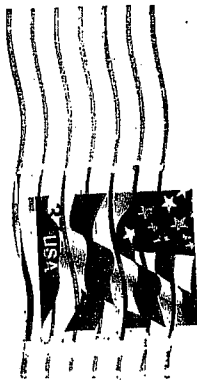
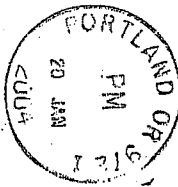
Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to put separate trails in for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Print Name Michael Wells

Address 8895 SW Hillsboro Hwy. Hillsboro, OR 97123

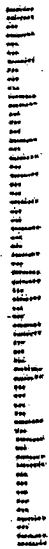
Signed 

Michael Wells
8895 SW Hillsboro Highway
Hillsboro, OR 97123



Bureau of Land Management
ATTN: Teal Porington
3050 NE 3rd Street
Prineville OR 97754

37754+2500



#1378

Mike Williams

01/22/2004 03:13 PM

To: Teal Purrington/PRFO/OR/BLM/DOI@BLM
cc: Mollie Chaudet/PRFO/OR/BLM/DOI@BLM
Subject: Late comment and add to Mailing list

Ed Ensley
63505 Bridle Ln.
Bend OR 97701

Called to Say that he supported closing the Badlands to motorized travel. I said that his comments would not be included in the comment analysis but that other people had made the same comment so his point of view wouldn't be ignored. I also told him that I would forward his comment and put him on the mailing list.

Mike Williams
Writer/Editor
Bureau of Land Management,
Prineville District

1379



"Shaylor Murray"
<shaylor@realestatechampions.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: pgilbert@quick.com [mailto:pgilbert@quick.com]
Sent: Thursday, December 18, 2003 11:34 AM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(pgilbert@quick.com) on Thursday, December 18, 2003 at 14:34:29

name: Dale Gilbert

address: P.O. Box 351 Redmond, OR 97756

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system. We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents. Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land. Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

#1380



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: steven.eldridge@office.xerox.com
[mailto:steven.eldridge@office.xerox.com]
Sent: Thursday, December 18, 2003 11:39 AM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(steven.eldridge@office.xerox.com) on Thursday, December 18, 2003 at
14:38:48

name: Steve Eldridge

address: 7405 SW 172nd Ave. Beaverton, OR 97007

comment: As a concerned citizen and recreationist I would like to be on
record as supportive of motorized recreation on BLM lands in Central Oregon.
The preferred alternative BLM is proposing does not adequately reflect how
an interim policy will be implemented. This interim policy greatly affects
our sport and the users as there are no assurances BLM will ever have the
resources to put together a designated trail system in the areas
proposed. The aggressive vegetation management in Alt. 7 of the Juniper
woodlands will negatively impact a proposed trail system.

I do not support the closure of the Badlands and feel that providing no
motorized opportunities at Prineville Reservoir and the Lapine area is a
mistake. There is use occurring in those areas currently, where will that
use go? Especially for the Lapine and Prineville residents.

The use of these areas are increasing approximately 20% annually with sales
of OHV equipment listed at \$18 billion annually - the increasing use is not
reflected in the severe limitations to OHV use on BLM land.

Please adopt a more flexible road trail density to allow for the best use of
the land and for a designated trail system that will succeed. By
micromanaging your areas and attempting to designate different trails for
several different uses in the same areas I feel the management will fail and
ultimately our use will suffer further restrictions.

Submit: Submit

#1381



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: arrowthwr@verizon.net [mailto:arrowthwr@verizon.net]
Sent: Thursday, December 18, 2003 12:15 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(arrowthwr@verizon.net) on Thursday, December 18, 2003 at 15:15:12

name: Rob Fleming

address: 8024 se 282nd ave.GreshamOR97080-9007

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1382



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: jimsmith@clearfreight.com [mailto:jimsmith@clearfreight.com]

Sent: Thursday, December 18, 2003 11:26 AM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(jimsmith@clearfreight.com) on Thursday, December 18, 2003 at 14:25:47

name: James D Smith

address: 5310 SW Chinook Ct Lake Oswego OR 97035

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: andrea@realestatechampions.com
[mailto:andrea@realestatechampions.com]
Sent: Thursday, December 18, 2003 12:09 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(andrea@realestatechampions.com) on Thursday, December 18, 2003 at 15:08:45

name: Andrea Erickson

address: 853 S.W. Hill st Bend Or 97702

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1384



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: skibunnie007@yahoo.com [mailto:skibunnie007@yahoo.com]
Sent: Thursday, December 18, 2003 12:10 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(skibunnie007@yahoo.com) on Thursday, December 18, 2003 at 15:10:01

name: christine rio

address: 2865 Spring Meadows Dr bozeman mt , 59715

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1385



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: mwhite1112@hotmail.com [mailto:mwhite1112@hotmail.com]

Sent: Thursday, December 18, 2003 12:23 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(mwhite1112@hotmail.com) on Thursday, December 18, 2003 at 15:23:05

name: Mike White

address: 13900 NW Laidlaw Rd, Portland, OR, 97229

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1386



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: brenner71@msn.com [mailto:brenner71@msn.com]

Sent: Thursday, December 18, 2003 12:53 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(brenner71@msn.com) on Thursday, December 18, 2003 at 15:53:06

name: Scott Charlton

address: 15303 SE Meadow Park Dr

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system. We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents. Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land. Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

#1387



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: TawmN@aol.com [mailto:TawmN@aol.com]
Sent: Thursday, December 18, 2003 1:37 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(TawmN@aol.com) on Thursday, December 18, 2003 at 16:37:09

name: T. Niemela

address: 1101 SE 53rd Court, Hillsboro, OR, 97123

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1388



"Shaylor Murray"
<shaylor@realestatechampions.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: dan@realestatechampions.com [mailto:dan@realestatechampions.com]
Sent: Thursday, December 18, 2003 2:58 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(dan@realestatechampions.com) on Thursday, December 18, 2003 at 17:58:11

name: Dan Linn

address: 2670 SW 30th St. Redmond, OR 97756

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1389



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

dup

-----Original Message-----

From: anilson@luhonline.com [mailto:anilson@luhonline.com]
Sent: Thursday, December 18, 2003 2:44 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(anilson@luhonline.com) on Thursday, December 18, 2003 at 17:43:32

name: Ace Nilson

address: 3060 Greenbriar St. Reedsport, OR 97467

comment: As a concerned citizen and recreationist who often visits and
recreates in Bend, I would like to be on record as supportive of motorized
recreation on BLM lands in Central Oregon.

The preferred alternative BLM is proposing does not adequately reflect how
an interim policy will be implemented. This interim policy greatly affects
our sport and the users as there are no assurances BLM ~~will~~ ever have the
resources to put together a designated trail system in the areas
proposed. The aggressive vegetation management in Alt. 7 of the Juniper
woodlands will negatively impact a proposed trail system.

We do not support the closure of the Badlands and feel that providing no
motorized opportunities at Prineville Reservoir and the Lapine area is a
mistake. There is use occurring in those areas currently, where will that
use go? Especially for the Lapine and Prineville residents.

Our use is increasing approximately 20% annually with sales of OHV equipment
listed at \$18 billion annually. – the increasing use is not reflected
in the severe limitations to OHV use on BLM land.

Please adopt a more flexible road trail density to allow for the best use of
the land and for a designated trail system that will succeed. By
micromanaging your areas and attempting to designate different trails for
several different uses in the same areas, we feel the management will fail
and ultimately our use will suffer further restrictions.

Furthermore this land has been used for decades by off-road members within
Oregon and surrounding states. By limiting recreation in these areas you
will negatively impact the economics of this region as well.

Why all of the sudden the need for restrictions. This land in question is
suddenly considered pristine wilderness. ***News Flash*** it will still be
considered pristine 50 years from now as we will have continued riding on
this land as we have for the previous 50 years.

Quit bowing to these ENVIORNMENTAL TERRIORSTS!!! Equal access for everyone
is the only answer. We'll share, come on out and enjoy the land...WITH
EVERYONE!!!

Please contact me with any further questions or if you have comment.
Sincerely,

Ace Nilson



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: dhollingsworth@coworkensport.com
[mailto:dhollingsworth@coworkensport.com]
Sent: Thursday, December 18, 2003 2:02 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(dhollingsworth@coworkensport.com) on Thursday, December 18, 2003 at
17:01:58

name: Dan Hollingsworth

address: 60149 Cheyenne, Bend, OR 97702

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system. We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents. Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually; the increasing use is not reflected in the severe limitations to OHV use on BLM land. Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

#1391



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: rclaypoole@bhy.net [mailto:rclaypoole@bhy.net]
Sent: Thursday, December 18, 2003 1:52 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(rclaypoole@bhy.net) on Thursday, December 18, 2003 at 16:52:21

name: Richard Claypoole

address: 8311 NE Holladay St. Portland, OR 97220

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1392



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: bendorguy@yahoo.com [mailto:bendorguy@yahoo.com]
Sent: Thursday, December 18, 2003 1:48 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(bendorguy@yahoo.com) on Thursday, December 18, 2003 at 16:47:34

name: Tom Wirth

address: 21081 Pinehaven Ave. Bend, OR 97702

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1393



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/18/2003 04:07 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: dj_t_ray@yahoo.com [mailto:dj_t_ray@yahoo.com]
Sent: Thursday, December 18, 2003 2:12 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(dj_t_ray@yahoo.com) on Thursday, December 18, 2003 at 17:12:18

name: Tyler Adams

address: 1035 54th St.

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1394



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/19/2003 04:18 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: TawnN@aol.com [mailto:TawnN@aol.com]

Sent: Thursday, December 18, 2003 1:37 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(TawnN@aol.com) on Thursday, December 18, 2003 at 16:37:09

name: T. Niemela

address: 1101 SE 53rd Court, Hillsboro, OR, 97123

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system. We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents. Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land. Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit

#1395



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/19/2003 04:18 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: rnstaylor@charter.net [mailto:rnstaylor@charter.net]
Sent: Thursday, December 18, 2003 4:15 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(rnstaylor@charter.net) on Thursday, December 18, 2003 at 19:15:08

name: Ryan L. Taylor

address: 1385 Burbridge Dr.

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system. We do not support the closure of the Badlands and feel that providing no motorized opportunities at Prineville Reservoir and the Lapine area is a mistake. There is use occurring in those areas currently, where will that use go? Especially for the Lapine and Prineville residents. Our use is increasing approximately 20% annually with sales of OHV equipment listed at \$18 billion annually - the increasing use is not reflected in the severe limitations to OHV use on BLM land. Please adopt a more flexible road trail density to allow for the best use of the land and for a designated trail system that will succeed. By micromanaging your areas and attempting to designate different trails for several different uses in the same areas we feel the management will fail and ultimately our use will suffer further restrictions.

Submit: Submit



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/19/2003 04:18 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: bc@teleport.com [mailto:bc@teleport.com]

Sent: Thursday, December 18, 2003 4:36 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(bc@teleport.com) on Thursday, December 18, 2003 at 19:36:17

name: William D Beane

address: 13067 SW 63rd PL Portland, OR 97219

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1397



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/19/2003 04:18 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: electricssheep@cybcon.com [mailto:electricssheep@cybcon.com]
Sent: Thursday, December 18, 2003 5:51 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(electricssheep@cybcon.com) on Thursday, December 18, 2003 at 20:50:29

name: Chris Vincent

address: 13687 S La Rae St. Oregon City OR. 97045

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/19/2003 04:18 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: buzzmurray1@netzero.com [mailto:buzzmurray1@netzero.com]
Sent: Thursday, December 18, 2003 7:54 PM
To: shaylor@realestatechampions.com
Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(buzzmurray1@netzero.com) on Thursday, December 18, 2003 at 22:53:53

name: Buzz A. Murray

address: 495 SW Liberty Bell Dr. Beaverton, OR 97006

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1399



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/19/2003 04:18 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: cyclegleason@comcast.net [mailto:cyclegleason@comcast.net]

Sent: Thursday, December 18, 2003 7:40 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(cyclegleason@comcast.net) on Thursday, December 18, 2003 at 22:40:06

name: Jeffrey R. Gleason

address: 7602 SE 112th. Ave. Portland, OR 97266

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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Submit: Submit

#1400



"Shaylor Murray"
<shaylor@realestatechampion
s.com>

12/19/2003 04:18 PM

To <upper_deschutes_rmp@or.blm.gov>, <brjoani@aol.com>

cc

bcc

Subject FW: COMAC and BLM

-----Original Message-----

From: buzzmurray1@netzero.com [mailto:buzzmurray1@netzero.com]

Sent: Thursday, December 18, 2003 7:58 PM

To: shaylor@realestatechampions.com

Subject: COMAC and BLM

Below is the result of your feedback form. It was submitted by
(buzzmurray1@netzero.com) on Thursday, December 18, 2003 at 22:57:37

name: Craig E. Stealey

address: 350 NW 135th Portland, OR 97229

comment: As a concerned citizen and recreationist I would like to be on record as supportive of motorized recreation on BLM lands in Central Oregon. The preferred alternative BLM is proposing does not adequately reflect how an interim policy will be implemented. This interim policy greatly affects our sport and the users as there are no assurances BLM will ever have the resources to put together a designated trail system in the areas proposed. The aggressive vegetation management in Alt. 7 of the Juniper woodlands will negatively impact a proposed trail system.

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